TSD File Inventory Index

Date July 27, 2004

Initial _____

Facility Name	CMC Kalamazoo Inc. (Our Folder Site)		
Facility Identification Number	MID 005 319 009		
A.1 General Correspondence		**B.2 Permit Docket (B.1.2)**	
A.2 Part A / Interim Status	X	1 Correspondence	
1 Correspondence	X	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	X	**C.1 Compliance - (Inspection Reports)**	X
.3 Part A Application and Amendments	X	**C.2 Compliance/Enforcement**	X
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
6 Annual and Biennial Reports		**C.3 FOIA Exemptions - Non-Releasable Documents**	
A.3 Groundwater Monitoring		**D.1 Corrective Action/Facility Assessment**	X
1 Correspondence		.1 RFA Correspondence	
2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure	X	.3 State Prelim. Investigation Memos	
1 Correspondence	X	4 RFA Reports	X
2 Closure/Post Closure Plans, Certificates, etc	X	**D. 2 Corrective Action/Facility Investigation**	
A.5 Ambient Air Monitoring		1 RFI Correspondence	
1 Correspondence		2 RFI Workplan	
2 Reports		3 RFI Program Reports and Oversight	
B.1 Administrative Record		4 RFI Draft /Final Report	

Total - 1

5 RFI QAPP		7 Lab data Soil Sampling/Groundwater	
6 RFI QAPP Correspondence		8 Progress Reports	
7 Lab Data, Soil-Sampling/Groundwater		**D.5 Corrective Action/Enforcement**	
8 RFI Progress Reports		1 Administrative Record 3008(h) Order	
9 Interim Measures Correspondence		.2 Other Non-AR Documents	
10 Interim Measures Workplan and Reports		**D.6 Environmental Indicator Determinations**	
D.3 Corrective Action/Remediation Study		1 Forms/Checklists	
1 CMS Correspondence		**E. Boilers and Industrial Furnaces (BIF)**	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
4 CMS Draft/Final Report		**F Imagery/Special Studies** (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		**G.1 Risk Assessment**	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
5 CMI QAPP		.8 Endangered Species Act	
6 CMI Correspondence		.9 Environmental Justice	

Note Transmittal Letter to Be Included with Reports
Comments Documents do not justify individual folder for schedule

A.1 Public Participation

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: September 7, 1983

SUBJECT: Checker Motors Corp./Closure Plan
MID 005 319 009

FROM: Barbara Russell
RAIU

TO: David Homer
STU #1

The attached advance copy of the public notice for Checker Motors Corp., 2016 N. Pitcher Street, Kalamazoo, Michigan, is scheduled to be published in the evening edition of the Kalamazoo Gazette, September 22, 1983.

Attachment

cc: Part A File
State Log

PUBLIC NOTICE

The U.S. Environmental Protection Agency (U.S. EPA) has received a closure plan from Checker Motors Corp., an automobile, taxi, and aerobus manufacturer, located at 2016 N. Pitcher Street, Kalamazoo, Michigan. The plan submitted on August 15, 1983, proposes the removal of 700 gallons of ignitable solvents, and sludges in waste containers (drums) off-site to an authorized disposal facility. No hazardous waste will remain on the site after closure, which the plan projects will be completed by September 30, 1983.

The Checker Motors Corp., plan was submitted to satisfy regulations promulgated under the Resource Conservation and Recovery Act. These were published under 40 CFR 265 Subpart G and Subpart K, which appeared in the Federal Register Jan. 12, 1981. The plan is evaluated by U.S. EPA according to the criteria of the regulations.

The plan and related background materials are available to the public at U.S. EPA Waste Management Branch, 230 S. Dearborn, 13th Floor, Chicago, Illinois, (312) 886-6940, from 8:30 a.m. to 4:30 p.m. Monday through Friday. These materials also may be seen at the Kalamazoo Public Library, 315 S. Rose, Kalamazoo, Michigan, during working business hours.

Public comments concerning this application are requested by U.S. EPA and will be accepted through October 24, 1983. Please send comments to:

United States Environmental Protection Agency
Region V
RCRA Activities
P.O. Box A3587
Chicago, Illinois 60690

ATTN: Barbara Russell

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• MID005319009 REACKNOWLEDGEMENT

CHECKER MOTORS CORP
2016 N PITCHER ST
KALAMAZOO MI 49007

INSTALLATION ADDRESS

2016 N PITCHER ST
KALAMAZOO MI 49007

EPA Form 8700-12B (4-80)

09/28/81

Please print or type with ELITE type *(12 characters/inch)* in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

U.S. ENVIRONMENTAL PROTECTION AGENCY

EPA NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

INSTALLATION'S EPA I.D. NO.: MID005319009

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS: CHECKER MOTORS CORPORATION
2016 N PITCHER ST
KALAMAZOO, MI 49007

000041 SEP 15 80

III. LOCATION OF INSTALLATION: 2016 N PITCHER ST
KALAMAZOO, MI 49007

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER: F MID005319009 T/A 2 C 1 — APPROVED: A — DATE RECEIVED (yr., mo., & day): 80 09 15

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3

CITY OR TOWN: 4 — ST. — ZIP CODE

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5

CITY OR TOWN: 6 — ST. — ZIP CODE

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: 2 MARKIN DAVID PRESIDENT — PHONE NO. *(area code & no.)*: 616-343-6121

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 CHECKER MOTORS CORPORATION

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*: M

F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*:

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: MID005319009

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

SEP 15 1980

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

S												T/A	C
W	M	I	D	0	0	5	3	1	9	0	0	9	2	1
1	2										13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F017					
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

☐ 1. IGNITABLE (D001) ☐ 2. CORROSIVE (D002) ☐ 3. REACTIVE (D003) ☐ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
David R Markin	David Markin, President	9/12/80

EPA Form 8700-12 (6-80) REVERSE

DETACH

DETACH

SEP 15 1980

CHECKER

Checker Motors Corporation Kalamazoo, Michigan 49007
Telephone: 616-343-6121

August 9, 1983

William H. Miner, Chief
Technical Permits and Compliance Section
USEPA, Region V
111 West Jackson Blvd.
Chicago, IL 60604

Re: 5HW
Withdrawal of Part A Application
Checker Motors Corp.
USEPA I D No. MID 005 319 009 PA, G, TSD

Dear Mr. Miner:

In response to your letter of March 22, 1983 we are submitting herewith a closure plan, although the hazardous waste disposed of was generated as a result of termination of Checker Automobile production. This waste represented excess materials no longer usable in our new production, and was disposed of in accordance with regulations of the State of Michigan. Copies of the manifests are submitted herewith as part of our closure plan.

Our aim is to become a "small quantities generator".

This closure plan is submitted despite the fact that we requested on August 20, 1982 that our application for permit to store hazardous waste be withdrawn, since paint residues (F 017) have been temporarily suspended from regulation (in accordance with your letter to us of 22 June 1982).

Yours sincerely,

David Markin, President

cc: M. O. Francisco
R. Rumbaugh

CHECKER

CLOSURE PLAN

Checker Motors Corporation

July 23, 1983

1. All hazardous wastes are removed from the premises of Checker Motors Corp. in accordance with regulations of the State of Michigan within 90 days of generation.

2. Hazardous wastes which have been disposed of within 90 days of generation are itemized in the copies of the manifests submitted as Attachment A to this Closure Plan.

3. All process equipment decommissioned with the termination of automobile production did not generate or become a hazardous waste.

4. Due to the fact that all hazardous wastes were accumulated and disposed of in drums, there is no residue in tanks or other facilities or equipment on area premises.

5. Any future hazardous materials generated on our premises will be accumulated and disposed of in drums within 90 days of generation in accordance with regulations of the State of Michigan.

CHECKER

Checker Motors Corporation Kalamazoo, Michigan 49007
Telephone: 616-343-6121

73 closure DH

June 20, 1983

RECEIVED
JUN 24 1983
WASTE MANAGEMENT BRANCH
EPA, REGION V

Mr. Karl J. Klepitsch Jr., Chief
Waste Management Branch
U.S.E.P.A.
RCRA Activities
Box A 3587
Chicago, IL 60690

Re: Part A Application (Paint Waste)
Facility Name: Checker Motors Corporation
USEPA ID NO.: MID-005-319-009 PA, G, TSD

Dear Mr. Klepitsch:

Referring to our letter to you of August 20, 1982 requesting withdrawal of our Part A Application for permit to store hazardous waste, we note that certification was inadvertently omitted. Therefore, we are submitting herewith Attachment A to our letter to you of August 20, 1982 containing the Certification.

Sincerely yours,

David R. Markin, President

Richard T. Rumbaugh
Waste Water Systems Operator

cc: M. Francisco
R. MacDonald
L. Temple

RECEIVED
6/24/83

CHECKER

June 20, 1983

ATTACHMENT A

This Attachment is to be appended to the letter of August 20, 1982 from Checker Motors Corporation to Mr. Karl J. Klepitsch, Jr. Chief, Waste Management Branch, USEPA, RCRA Activities, Box A 3587, Chicago, IL 60690 (copy enclosed).

CERTIFICATION

Referring to the letter identified above:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

David R. Markin, President
Checker Motors Corporation

CHECKER

Checker Motors Corporation Kalamazoo, Michigan 49007
Telephone: 616-343-6121

August 20, 1982

Mr. Karl J. Klepitsch, Jr. Chief
Waste Management Branch
U.S. Environmental Protection Agency
RCRA Activities
Box A 3587
Chicago, IL 60690

RE: Part A Application (Paint Waste)
FACILITY NAME: Checker Motors Corporation
USEPA ID NO.: MID-005-319-009

Dear Mr. Klepitsch:

We are asking that our application for permit to store hazardous waste (Part A) be withdrawn. Reasons for our withdrawal are:

1. The termination of the Checker automobile production has ended the majority of our paint processing.

2. The remaining paint processes have been refined to the point that no hazardous waste will be generated on a regular basis.

Sincerely yours,

David R. Markin, President

Richard T. Rumbaugh
Waste Water Systems Operator

sw

: M. Francisco
B. Purdy
L. Temple

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

5HW

MAR 2 2 1983

Mr. David R. Markin, President
Checker Motors Corporation
Kalamazoo, Michigan 49007

RE: Withdrawal of Part A Application
Facility Name: Checker Motors Corporation
USEPA ID No: MID 005 319 009

Dear Mr. Markin:

We have reviewed your Part A hazardous waste permit application and your 8/20/82, request to withdraw the application. Based on the information you have submitted, we concur that your facility is not required to have a hazardous waste permit at this time under Section 3005 of the Resource Conservation and Recovery Act. However, your facility treated, stored, or disposed of hazardous waste after November 19, 1980, and must therefore file a closure plan (40 CFR Part 265 Subpart G, enclosed) before the permit application can be withdrawn. You must also comply with any applicable State and local requirements for this change.

Please contact Joe Boyle at (312) 886-3754 if you have any questions.

Sincerely,

William H. Miner

William H. Miner, Chief
Technical, Permits, and Compliance Section

cc: MDNR

CHECKER

Checker Motors Corporation Kalamazoo, Michigan 49007
Telephone: 616-343-6121

J. Bayle

June 30, 1982

U.S. Environmental Protection Agency
Region V
111 West Jackson Blvd.
Chicago, IL 60604

Attention: Mr. Karl J. Klepitsch, Jr.
Chief Waste Management Branch

Reference: Your letter dated 6-22-82 regarding Part A Application
DKT (Paint Waste)-USEPA No: MlD-005-319-007 Checker Motors Corp. G, TSD, PA

Gentlemen:

Would you send to my attention copies of your U.S.E.P.A. Hazardous Waste Nos. F017, F018, K078, K079, K0 81, K082, which,per your letter, has been temporarily suspended from regulation. Also, 40 CFR Part 261.31, 261.32, 261.2, 261.4?, 261.22, 261.21, and sub-part D of 40 CFR, part 261, as we do not have above data on file.

Please rush above data at your earliest convenience.

Sincerely,

M. O. Francisco /mb.

M. O. Francisco
Plant Engineer

mb

CHECKER

Checker Motors Corporation Kalamazoo, Michigan 49007
Telephone: 616-343-6121

August 20, 1982

Mr. Karl J. Klepitsch, Jr. Chief
Waste Management Branch
U.S. Environmental Protection Agency
RCRA Activities
Box A 3587
Chicago, IL 60690

RE: Part A Application (Paint Waste)
FACILITY NAME: Checker Motors Corporation
USEPA ID NO.: MID-005-319-009

Dear Mr. Klepitsch:

We are asking that our application for permit to store hazardous waste (Part A) be withdrawn. Reasons for our withdrawal are:

1. The termination of the Checker automobile production has ended the majority of our paint processing.

2. The remaining paint processes have been refined to the point that no hazardous waste will be generated on a regular basis.

Sincerely yours,

David R. Markin, President

Richard T. Rumbaugh
Waste Water Systems Operator

RTR/sw

cc: M. Francisco
B. Purdy
L. Temple

lease print or type in the unshaded areas only
fill-in areas are spaced for elite type, i.e., 12 characters/inch).

540

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

EPA I.D. NUMBER

	1	2	3	4	5	6	7	8	9	10	11	T/A	C
	F	M	I	D	0	0	5	3	1	9	0		D

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

RECEIVED
DEC 23 1980
WASTE MANAGEMENT BRANCH
EPA, REGION V

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill-in area*(s)* below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of **bold-faced terms.**

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: Checker Motors Corporation

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 Francisco Marvin Plant Eng.	616 343 6121

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX	B. CITY OR TOWN	C. STATE	D. ZIP CODE
3 2016 N Pitcher St.	4 Kalamazoo	MI	49007

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER	B. COUNTY NAME	C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
5 2016 N Pitcher St.	Kalamazoo	6 Kalamazoo	MI	49007	39

EPA Form 3510-1 (6-80)

DEC 19 1980

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
3465 (specify) Automotive Stampings	3479 (specify) Metal Coating
C. THIRD	**D. FOURTH**
3714 (specify) Motor Vehicle Parts	N.A. (specify)

VIII. OPERATOR INFORMATION

A. NAME

Checker Motors Corporation

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)

F = FEDERAL
S = STATE
P = PRIVATE
M = PUBLIC (other than federal or state)
O = OTHER (specify)

P (specify) NA

D. PHONE (area code & no.)

A 616 343 6121

E. STREET OR P.O. BOX

2016 N Pitcher St

F. CITY OR TOWN

B Kalamazoo

G. STATE MI

H. ZIP CODE 49007

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [X] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
9 N MI0005819	9 P NA
B. UIC (Underground Injection of Fluids)	**E. OTHER** (specify)
9 U NA	9 NA (specify)
C. RCRA (Hazardous Wastes)	**E. OTHER** (specify)
9 R MID005319009	9 NA (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Manufacturing automobiles, taxis, aerobuses; metal stamping, spotwelding, assemblies, metal coating.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
David A. Markin, President		12/18/80

COMMENTS FOR OFFICIAL USE ONLY

C

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

EPA I.D. NUMBER: F M I D 0 0 5 3 1 9 0 0 9 — T/A: — C: 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

- [ ] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*
- [X] 2. NEW FACILITY *(Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*: C 8 — YR. — MO. — DAY

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN: YR. 7 9 — MO. 1 0 — DAY 0 1

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

- [ ] 1. FACILITY HAS INTERIM STATUS
- [ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C D U P — T/A: — C: 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 1	1100	G		7				
					8				
3					9				
4					10				

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

NA

IV. DESCRIPTION OF HAZARDOUS WASTES

A. **EPA HAZARDOUS WASTE NUMBER** – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. **ESTIMATED ANNUAL QUANTITY** – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. **UNIT OF MEASURE** – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.
NOTE: Photocopy this page before completi[ng] if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)		FOR OFFICIAL USE ONLY	
W M I D 0 0 5 3 1 9 0 0 9	T/A: 1	W DUP	T/A: 2 DUP

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	F 0 1 7	3100	P	S 0 1	NA
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

EPA Form 3510-3 (6-80)

CONTINUE ON REVERSE

(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

NA

EPA I.D. NO. (enter from page 1)

F MID005319009 T/A C 6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).*

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground—level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).*

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)
42 18 43	85 34 44

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
E NA	NA

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F NA	G NA	NA	NA

IX. OWNER CERTIFICATION

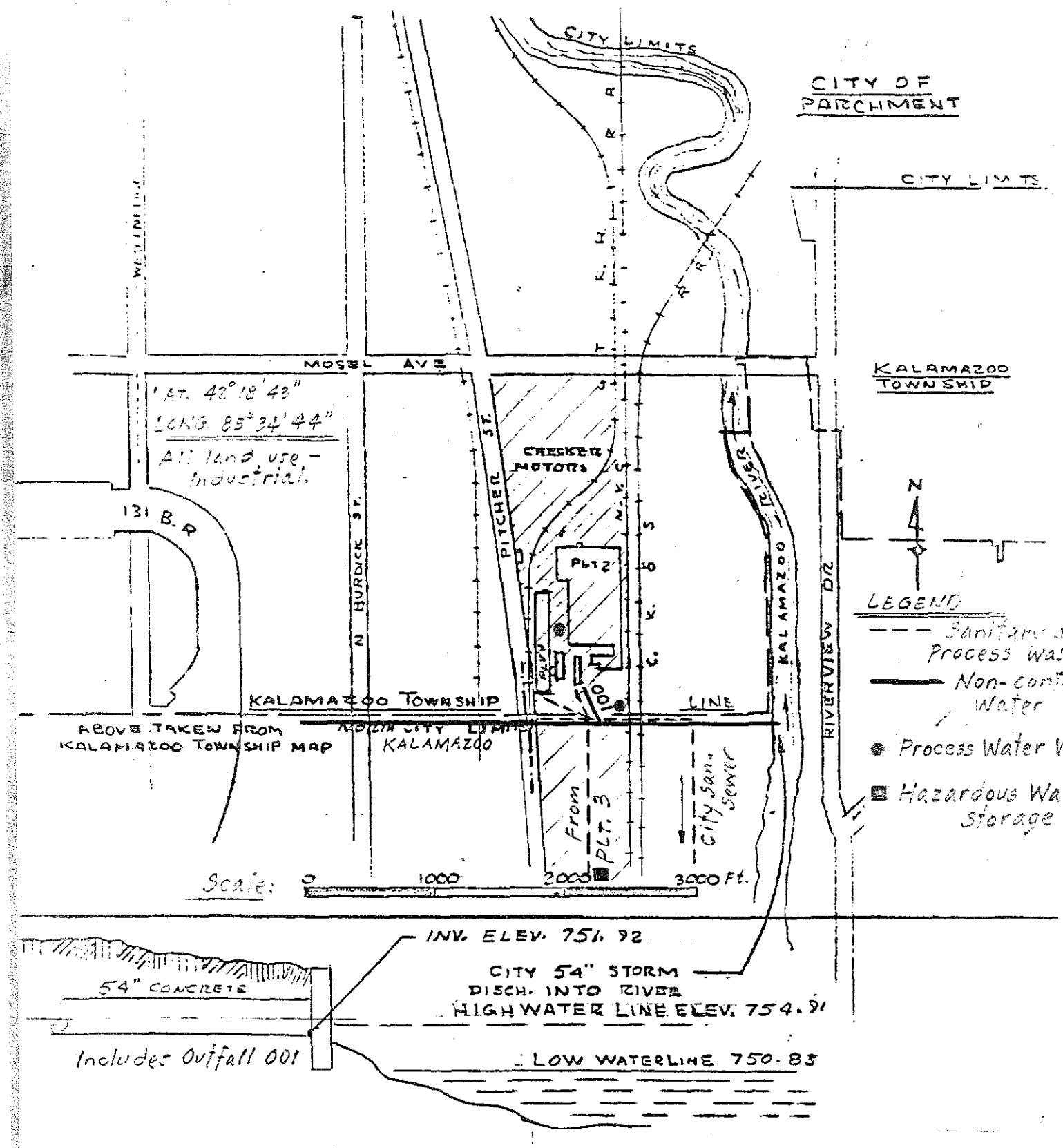
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
David A. Markin	D A Markin	12/18/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
NA	NA	NA



INTAKE AND DISCHARGE STRUCTURES AND
HAZARDOUS WASTE STORAGE AREA
CHECKER MOTORS CORPORATION 12/16/80 AJP

Continued from page 4.

Form Approved OMB No. 158-S80004

V. FACILITY DRAWING *(see page 4)*

NA (NEW FACILITY)

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other ______

II. GENERATOR'S EPA I.D. NUMBER

T/A C

F M I D 0 0 5 3 1 9 0 0 9 1

1 2 13 14 15

C303 ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF INSTALLATION

C H E C K E R M O T O R S C O R P O R A T I O N

30 69

IV. INSTALLATION MAILING ADDRESS

3 2 0 1 6 N O R T H P I T C H E R S T R E E T

15 16 45

Street or P.O. Box

4 K A L A M A Z O O | M I | 4 9 0 0 7

15 16 | 41 42 | 47 51

City or Town | State | Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

5

15 16 45

Street or Route number

6

15 16 | 41 42 | 47 51

City or Town | State | Zip Code

VI. INSTALLATION CONTACT

2 R U M B A U G H R I C H A R D

15 16 45

Name (last and first)

6 1 6 – 3 4 3 – 6 1 2 1

46 55

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

David R. Markin, President — [signature] — June 26, 1984

Print/Type Name | Title | Signature of Authorized Representative | Date Signed

EPA Form 8700-13A(5-80) (Revised 11-83)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G M I D 0 0 5 3 1 9 0 0 9 T/A 1 C

(1 2 ... 13 14 15)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

A 1 Disposal Corporation

X. FACILITY'S EPA I.D. NO.

F M I D 0 5 9 6 9 5 4 5 2

(16 ... 28)

XI. FACILITY ADDRESS

P.O. Box 248/400 Broad St.
Plainwell, Michigan 49080

XII. TRANSPORTATION SERVICES USED

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)		D. Amount of Waste	E. Unit of Measure
	1	Ignitable, Gasoline	0 8	D 0 0 1		3 4 0 0	P
	2	Ignitable, Adhesive	0 8	D 0 0 1		5 3 9	P
	3	Ignitable, polymers, sealants & mixed solvents	0 8	D 0 0 1		6 4 9	P
	4						
	5						
	6						
	7						
	8						
	9						
	10						
	11						
	12						

(Sequence #: 29 ... 32; B. DOT Hazard code: 33 34; C. EPA Hazardous Waste No.: 35 ... 38, 39 ... 42, 43 ... 46, 47 ... 50; D. Amount of Waste: 51 ... 59; E. Unit of Measure: 60)

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

Do not make entries in shaded areas

ENVIRONM. TAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

1	2											13	T/A 14	C 15
G	M	I	D	0	0	5	3	1	9	0	0	9		1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Chem-Met Services, Inc.

X. FACILITY'S EPA I.D. NO.

16												28
F	M	I	D	0	9	6	9	6	3	1	9	4

XI. FACILITY ADDRESS

18550 Allen Road
Wyandotte, Michigan 48192

XII. TRANSPORTATION SERVICES USED

A-1 Disposal Corporation

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	Ignitable, EP Toxic, polymers, resins, and mixed solvents	08 (33 34)	D001 D005 (35 38) D007 (39 42) D008 (43 46 47 50)	15457 (51 59)	P (60)
	2	Waste water treatment sludge from electro plating operation, electroplating and paint sludge.	15	F005	704	P
	3	Ignitable polymers, sealants, and mixed solvents	08	D001	19186	P
	4	Ignitable adhesive sludge.	08	D001	6474	P
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

A.4 Closure/ Post-Closure

CHECKER

Checker Motors Corporation Kalamazoo, Michigan 49007
Telephone: 616-343-6121

December 12, 1983

MID005319009 PA,G,TSD-8

United States Environmental Protection Agency
Region V
230 South Dearborn St.
Chicago, IL 60604

Attention: Mr. Basil G. Constantelos
Director Waste Management Division

Dear Mr. Constantelos:

I hereby certify that the hazardous waste storage operations at our plant were closed in accordance with the Closure Plan approved by your letter to me of November 10, 1983.

Submitted herewith is an independent certification by Mr. Anthony J. Palladino, Registered Professional Engineer.

Yours truly,

David Markin
President

mb

cc: M. Francisco
R. Rumbaugh

Anthony J. Palladino

REGISTERED PROFESSIONAL ENGINEER

739 ACADEMY ST. - KALAMAZOO, MICHIGAN 49007 - (616) 342-0681

December 3, 1983

To whom it may concern:

I hereby certify that the "hazardous waste storage operations" at the Checker Motors Corporation, 2016 N. Pitcher St., Kalamazoo, Michigan have been closed in accordance with the specifications in the approved closure plan.

This certification is based upon an inspection of the closed facility MID005319009) on November 26, 1983 in the presence of Mr. M.O. Francisco, Plant Engineer, and Mr. Richard Rumbaugh, Chief Chemist, Checker Motors Corporation, and upon information given to the undersigned by Messrs. Francisco and Rumbaugh.

Signed: Anthony J. Palladino

Anthony J. Palladino
Registered Professional Engineer
Michigan 8044

Date: December 3, 1983

5HW-13

NOV 10 1983

David Markin, President
Checker Motors Corporation
2016 N. Pitcher Street
Kalamazoo, Michigan 49007

RE: Closure Plan
MID005319009

Dear Mr. Markin:

On August 9, 1983, Checker Motors Corporation submitted a closure plan for storage operations at the above-referenced facility. The plan called for the removal of all hazardous waste and the instituting of the practice of removing waste within 90-days of accumulation. A 30-day public comment period on the plan ended on October 24, 1983, and the Agency received no comments.

The closure plan is hereby approved with the following condition - any contamination in the storage area must be removed in accordance with 40 CFR 265.114 (enclosed). Please submit the necessary certification after the approved closure has been completed (40 CFR 265.115 enclosed).

You may contact Dr. David Howard of my staff at (312) 886-3790 if you have any questions on this matter.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

Enclosure

cc: Alan J. Howard, MDNR

5HW-13:DHoward:THaywood:11/01/83

	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMB DIRECTOR
INITIALS		DH						DS
DATE	11/0/83	11/01/83			11/4/83	11/4/83	11/7/83	11/9/83

11/4/83 11/7/83 11/10/83

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: NOV 08 1983

SUBJECT: Closure Plan Checker Motors Corp, Kalamazoo, Michigan
EPA ID No. MIDO05319009

FROM: Karl J. Klepitsch Jr., Chief
Waste Management Branch

TO: Basil G. Constantelos, Director
Waste Management Division

The subject facility submitted a closure plan for their container storage area. The closure plan calls for removal of hazardous waste on-site and instituting the practice of removing waste within 90 days of accumulation. It is recommended the closure plan be approved with the following condition - any contamination in the storage area must be removed in accordance with 40 CFR 265.114.

5HW-13:DHauser:THaywood:11/01/83

	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	DI...
INITIALS		DH			WEM			
DATE	11/01/83	11/1/83			11/4/83	11/4/83	11/7/83	

SHW-13

Mr. Alan J. Howard
Hazardous Waste Division
Michigan Department of Natural Resources
Post Office Box 30028
Lansing, Michigan 48909

RE: Closure Plan
Facility EPA ID No: MID005319009
Facility Name: Checker Motors Corp.

Dear Mr. Howard:

Enclosed is a copy of the closure plan for the referenced facility. Per the FY '83 Cooperative Arrangement Task 2, Output 2, please review and comment on the adequacy of this closure plan. Please forward your comments to this office by September 30, 1983.

If you have any questions regarding this plan, please contact Dr. David Homer of my office at (312) 886-3790 for assistance. Thank you for cooperation.

Sincerely,

William H. Miner, Chief
Technical, Permits and Compliance Section

Enclosure

bcc: Jodi Traub
Joseph Boyle

INITIALS / DATE	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
	SHW-13:DHomer:TNaywood 8/29/83	8/30/83	8/29/83		8/24/83	8/31/83 8/31/83		

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: October 27, 1983

SUBJECT: Checkers Mtoors Coporation/Closure Plan
MID 005 319 009

FROM: Barbara Russell BC
RAIU

TO: David Homer
STU #1

This memo is to inform you that the public comment period for Checkers Motors Corp., 2016 N. Pitcher Street, Kalamazoo, Michigan, ended October 24, 1983. There were no public comments.

cc: Part A File
State Log

STATE OF MICHIGAN

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

RONALD O. SKOOG, Director

September 19, 1983

Dr. David Homer
Technical, Permits and
Compliance Section, 5HW-TUB
U.S. EPA - Region V
230 South Dearborn
Chicago, Illinois 60604

Re: MID 005319009
Checker Motor Corporation

Dear Dr. Homer:

As requested by your office, enclosed are the comments on the closure plan for the above-referenced facility.

Please call if you have questions.

Sincerely,

Peter Quackenbush

Peter Quackenbush
Technical Services Section
Hazardous Waste Division

Enclosure
cc: Jodi Traub, EPA

Checker Motor Corporation Closure Plan Comments

1. An estimate of the inventory of waste to be disposed of was not provided to comply with 40 CFR 265.112(a)(2).

2. It was not indicated whether there was leakage from drums that would require decontamination in the storage area to comply with 40 CFR 265.112(a)(3).

3. No certification of closure as required by 40 CFR 265.115 was provided.

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

5HW-13

Clerk
TSD

JAN 5 1984

2614

Mr. David Markin
President
Checker Motors Corporation
Kalamazoo, Michigan 49007

RE: Certification of Closure Plan
EPA I.D. No. MID005319009

Dear Mr. Markin:

Your December 12, 1983, letter informed this Agency that the approved closure plan for Checker Motors' Pitcher Avenue storage facility has been executed, and that closure has been certified by Anthony J. Palladino, P.E.. The facility will retain its identification number as a hazardous waste generator. Please be advised that you must ensure your waste is handled in accordance with the generator standards outlined in 40 CFR Part 262.

Please contact Dr. David Homer of my staff at (312) 886-6146, if you have any questions.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

cc: Alan Howard, MDNR

JAN 5 1984

5HW-13

Mr. David Markin
President
Checker Motors Corporation
Kalamazoo, Michigan 49007

RE: Certification of Closure Plan
EPA I.D. No. MID005319009

Dear Mr. Markin:

Your December 12, 1983, letter informed this Agency that the approved closure plan for Checker Motors' Pitcher Avenue storage facility has been executed, and that closure has been certified by Anthony J. Palladino, P.E.. The facility will retain its identification number as a hazardous waste generator. Please be advised that you must ensure your waste is handled in accordance with the generator standards outlined in 40 CFR Part 262.

Please contact Dr. David Homer of my staff at (312) 886-6146, if you have any questions.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

cc: Alan Howard, MDNR

5HW-13:DHOMER:SSMITH:1/3/84

	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
INITIALS		DH						
DATE	1-3-84	1/3/84			1/3/84	1/4/84	1/4/84	1/5/84 1/6/84

STATE OF MICHIGAN

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

DAVID F. HALES, Director

Plainwell District Headquarters
P.O. Box 355, Plainwell, Michigan 49080

February 22, 1989

Richard Rumbaugh
Checker Motors
2016 North Pitcher
Kalamazoo, Michigan 49007

Re: EPA ID #MID005319009

Dear Mr. Rumbaugh:

On February 16, 1989, staff of the Department of Natural Resources conducted an inspection of your facility to evaluate compliance with requirements of Subtitle C of the Resource Conservation and Recovery Act, 1976, as amended (RCRA); Michigan's Hazardous Waste Management Act, 1979 PA 64, as amended (Act 64); and Michigan's Liquid Industrial Waste Haulers Act, 1969 PA 136, as amended (Act 136).

Based upon the inspection, it has been determined that the facility is in violation of the requirements:

1. Containers of hazardous waste must be inspected weekly for leaks and defects as required by Rule 306 of Act 64.

2. Secondary containment has not been provided for all liquid hazardous waste accumulated on-site as required by Rule 306. Specifically, the paint waste was accumulated on a concrete floor that had floor drains exiting to the parking lot. Rule 306 of Act 64 requires containment to be provided for 10 percent of the volume of all liquid hazardous waste on-site so that the material cannot escape by gravity to the waters of the state.

3. Personnel training was not completed and records were not available as required by Rule 306(1)(d) of Act 64.

4. The spill plan must be amended/expanded to include a more detailed list of emergency equipment (including location, etc.), an evacuation plan, a description of arrangements agreed to by local emergency responders, along with an explanation of how to handle a spill/release of the hazardous wastes as required by Rule 306 of Act 64.

We request that you respond to this letter by March 23, 1989, providing documentation to this office regarding those actions taken to correct these violations.

Thank you for the courtesy and cooperation extended to me during the inspection. If you have any questions regarding this matter, please feel free to contact me at (616) 685-9886.

Sincerely,

Lynn M. Spurr
Environmental Quality Analyst
Waste Management Division
Plainwell District

LMS:ls

Enclosure

cc: U.S. EPA - Region V

2/16/89
Checker Motors
Kalamazoo MI
APP

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes? NO

		Gen.	Treat	Store	Disp.	Trans.
A.	F-Solvent Wastes					
1.	F001	____	____	____	____	____
2.	F002	____	____	____	____	____
3.	F003	____	____	____	____	____
4.	F004	____	____	____	____	____
5.	F005	____	____	____	____	____

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes NO

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	____	____	____	____	____
Cadmium	100 mg/L	____	____	____	____	____
Chromium VI	500 mg/L	____	____	____	____	____
Lead	500 mg/L	____	____	____	____	____
Mercury	20 mg/L	____	____	____	____	____
Nickel	134 mg/L	____	____	____	____	____
Selenium	100 mg/L	____	____	____	____	____
Thallium	130 mg/L	____	____	____	____	____

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L NO

Gen.	Treat	Store	Disp.	Trans.
____	____	____	____	____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0 NO

____	____	____	____	____

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to NO

50 ppm	____	____	____	____	____
500 ppm	____	____	____	____	____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

____ Yes ____ No ____ NA

If yes, state reasons for mixing:

_____

_____

5. Hazardous waste that contains HOCs greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (solids) NO

____	____	____	____	____

Note (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.

Note (2): The effective date of regulation for liquid wastes with HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater than or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.

C. First Third Wastes

Note: (1) The detailed description for waste codes are listed in Appendix C.
(2) EPA has promulgated the treatment standards for the following waste code with *.

NO

	Gen.	Treat	Store	Disp.	Trans.
F006*	____	____	____	____	____
F007	____	____	____	____	____
F008	____	____	____	____	____
F009	____	____	____	____	____
F019	____	____	____	____	____
K001*	____	____	____	____	____
K004*	____	____	____	____	____
K008*	____	____	____	____	____
K011	____	____	____	____	____
K013	____	____	____	____	____
K014	____	____	____	____	____
K015*	____	____	____	____	____
K016*	____	____	____	____	____
K017	____	____	____	____	____
K018*	____	____	____	____	____
K019*	____	____	____	____	____
K020*	____	____	____	____	____
K021*	____	____	____	____	____
K022*	____	____	____	____	____
K024*	____	____	____	____	____
K025*	____	____	____	____	____
K030*	____	____	____	____	____
K031	____	____	____	____	____
K035	____	____	____	____	____
K036*	____	____	____	____	____
K037*	____	____	____	____	____
K044*	____	____	____	____	____
K045*	____	____	____	____	____
K046*	____	____	____	____	____

	Gen.	Treat	Store	Disp.	APP Trans.
K047*	____	____	____	____	____
K048*	____	____	____	____	____
K049*	____	____	____	____	____
K050*	____	____	____	____	____
K051*	____	____	____	____	____
K052*	____	____	____	____	____
K060*	____	____	____	____	____
K061*	____	____	____	____	____
K062*	____	____	____	____	____
K069*	____	____	____	____	____
K071*	____	____	____	____	____
K073*	____	____	____	____	____
K083*	____	____	____	____	____
K084	____	____	____	____	____
K085	____	____	____	____	____
K086*	____	____	____	____	____
K087*	____	____	____	____	____
K099*	____	____	____	____	____
K100*	____	____	____	____	____
K101*	____	____	____	____	____
K102*	____	____	____	____	____
K103*	____	____	____	____	____
K104*	____	____	____	____	____
K106*	____	____	____	____	____
P001	____	____	____	____	____
P004	____	____	____	____	____
P005	____	____	____	____	____
P010	____	____	____	____	____
P011	____	____	____	____	____
P012	____	____	____	____	____
P015	____	____	____	____	____
P016	____	____	____	____	____
P018	____	____	____	____	____

APP

	Gen.	Treat	Store	Disp.	Trans.
P020					
P030					
P036					
P037					
P039					
P041					
P048					
P050					
P058					
P059					
P063					
P068					
P069					
P070					
P071					
P081					
P082					
P084					
P087					
P089					
P092					
P094					
P097					
P102					
P105					
P108					
P110					
P115					
P120					
P122					
P123					
U007					
U009					

	Gen.	Treat	Store	Disp.	APP Trans.
U010	____	____	____	____	____
U012	____	____	____	____	____
U016	____	____	____	____	____
U018	____	____	____	____	____
U019	____	____	____	____	____
U022	____	____	____	____	____
U029	____	____	____	____	____
U031	____	____	____	____	____
U036	____	____	____	____	____
U037	____	____	____	____	____
U041	____	____	____	____	____
U043	____	____	____	____	____
U044	____	____	____	____	____
U046	____	____	____	____	____
U050	____	____	____	____	____
U051	____	____	____	____	____
U053	____	____	____	____	____
U061	____	____	____	____	____
U063	____	____	____	____	____
U064	____	____	____	____	____
U066	____	____	____	____	____
U067	____	____	____	____	____
U074	____	____	____	____	____
U077	____	____	____	____	____
U078	____	____	____	____	____
U086	____	____	____	____	____
U089	____	____	____	____	____
U103	____	____	____	____	____
U105	____	____	____	____	____
U108	____	____	____	____	____
U115	____	____	____	____	____
U122	____	____	____	____	____
U124	____	____	____	____	____

	Gen.	Treat	Store	Disp.	APP Trans.
U129					
U130					
U133					
U134					
U137					
U151					
U154					
U155					
U157					
U158					
U159					
U171					
U177					
U180					
U185					
U188					
U192					
U200					
U209					
U210					
U211					
U219					
U220					
U221					
U223					
U226					
U227					
U228					
U237					
U238					
U248					
U249					

EPA

Plainwell District Headquarters
Box 355, Plainwell, Michigan 49080

July 30, 1985

Dick Rumbaugh
Checker Motors Corporation
2016 North Pitcher
Kalamazoo, Michigan 49007

Re: EPA ID # - MID 005319009

Dear Mr. Rumbaugh:

Based upon your letter of July 23, 1985, staff of the Department have determined that your facility qualifies for the small quantity generator status outlined in 40 CFR 261.5 and is in compliance with the Federal Resource Conservation and Recovery Act, as amended. If 1,000 kilograms (2,200 pounds) of hazardous waste is generated per month or is on-site at any time, the facility is subject to the generator standards outlined in 40 CFR Part 262.

Michigan's Hazardous Waste Management Act and RCRA state that if more than 100 kilograms (220 pounds) of hazardous waste is generated in a calendar month or accumulated at any time, the waste must be disposed of at a facility licensed under the Act.

All liquid industrial waste removed from your facility by another firm must be with a licensed liquid industrial waste hauler and you must use the manifest reporting form.

If you have any questions regarding this matter, please feel free to contact me at 685-9886.

Sincerely,

LSP

Lynn M. Spurr, Water Quality Specialist
Hazardous Waste Division
Plainwell Compliance District

LMS:ls

cc: U.S. EPA - Region V

CHECKER

Checker Motors Corporation Kalamazoo, Michigan 49007
Telephone: 616-343-6121

July 23, 1985

Michigan Department of Natural Resources
621- 10th Street
Plainwell, MI 49080

Attention: Ms. Lynn Spurr

Reference: Small Quantity Generator Status

Dear Ms. Spurr:

Checker Motors Corporation has achieved Small Quantity Generator Status. The company has stopped or reduced the activities that generated hazardous waste.

With more reductions and termination of hazardous waste generating activities planned, the Checker Motors Corporation will maintain Small Quantity Generator Status.

Sincerely,

Richard Rumbaugh

b

cc: EPA 7/24/85

EPA

Plainwell District Headquarters
Box 355, Plainwell, Michigan 49080

April 2, 1985

Dick Rumbaugh
Checker Motors Corporation
2016 North Pitcher Street
Kalamazoo, Michigan 49007

Re: EPA ID # - MID 005319009

Dear Mr. Rumbaugh:

On March 6, 1985, staff of the Michigan Department of Natural Resources visited your facility to evaluate compliance with the Federal Resource Conservation and Recovery Act (RCRA), as amended, and Michigan's Hazardous Waste Management Act (P.A. 64, 1979, as amended).

Prior to that inspection, Checker Motors had been considered to be a small quantity generator subject to the exemption outlined in 40 CFR 261.5. Recently our office has been advised that wastewater treatment sludge from phosphate operations is considered to be an electroplating sludge listed in the F006 waste code description. Based upon this knowledge, Checker Motors had more than 1,000 kilograms (2,200 pounds) of hazardous waste in storage on March 6. In addition, the residual in the paint strip tank should be evaluated to determine if it is a hazardous waste.

Technically, the facility should be complying with the generator requirements outlined in 40 CFR, Part 262, since more than 1,000 kilograms of hazardous waste is on-site.

Per our telephone conversation on April 2, you indicated that you are presently reevaluating the rate Checker Motors generates regulated quantities of hazardous waste in light of the phosphate waste issue.

It is requested that you respond regarding this determination by April 26, 1985. If the hazardous waste in storage has not been transported off-site, the company must comply with the generator requirements. This should also be addressed in your response.

continued...

Please contact me at (616) 685-9886 if you have any questions regarding this matter.

Sincerely,

LSP

Lynn M. Spurr, Water Quality Specialist
Hazardous Waste Division
Plainwell Compliance District

LMS:ls

cc: U.S. EPA - Region V

RCRA Inspection Report

EPA Identification Number: M I D 0 0 5 3 1 9 0 0 9

Installation Name: Checker Motors Corp.

Location Address: 2016 N Pitcher Street

City: Kalamazoo State: MI

Date of inspection: 3/6/85 Time of inspection (from) 10:55 (to) 12:10

Person(s) interviewed	Title	Telephone
Marvin Francisco	Plant Eng.	616-343-6121
Dick Pumbaugh		616 343-6121

Inspector(s)	Agency/Title	Telephone
Lynn Spaur	MDNR/WQS	616-685-9886

Installation Activity (mark only one box) Inspection Form(s)

- ☐ Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation — A
- ☐ Treatment/Storage/Disposal (no generation or Transportation) — A
- ☐ Generation and Transportation — B, C
- ☒ Generation only based upon new knowledge of phosphate sludge being F006 — B
- ☐ Transportation only — C
- ~~☒ SQG~~

3½ Dr of solvent plus phosphate ~1000 kg

INSPECTION FORM B

Section A: Scope of inspection

Standards for generators of HAZARDOUS WASTE subject to 40 CFR 262.10

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	Yes	No	NI*	Remarks
(1) Does the generator have copies of the manifest available for review? 262.40	✓			
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. _____				
(3) Do the manifest forms examined contain the following information? (If possible, make copies of, or record information from, manifests that do not contain the critical elements) 262.21				
a. Manifest document number?				
b. Name, mailing address, telephone number, and EPA ID number of generator?				
c. Name and EPA ID number of transporter(s)?				
d. Name, Address, and EPA ID Number of designated permitted facility and alternate facility?				
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?				
f. The total quantity of waste(s) and the type and number of containers loaded?				
g. Required certification?				
h. Required signatures?				

(4) Reportable exceptions 262.42

a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. _____

b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. _____

Section C - PRE-TRANSPORT REQUIREMENTS
(40 CFR Part 262 Subpart C)

		Yes	No	NI	Remarks
(1)	Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	✓			
(2)	Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site)	✓			
(3)	If required, are placards available to transporter? 262.33	✓			
** (4)	Pre-shipment Accumulation:				
a.	Is hazardous waste accumulated in containers? If no, skip to b. 262.34	✓			
i.	Is each container clearly marked with the date on which the period of accumulation began?	✓			
ii.	Have more than 90 days elapsed since the dates marked?		✓		
iii.	Is each container labeled or marked clearly with the words "Hazardous Wastes?"	✓			
iv.	Are containers in good condition?	✓			
v.	Are containers compatible with waste in them?	✓			
vi.	Are containers managed to prevent leaks?	✓			
vii.	Are containers stored closed?	✓			
viii.	Are containers inspected weekly for leaks and defects?	✓			
ix.	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	✓			

** applies only to GENERATORS that store hazardous waste on-site for 90 days or less without a permit. These items do not apply to generators whose waste is immediately transported off-site.

	Yes	No	NI	Remarks
x. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)				no incompatible
xi. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?				N/A
b. Is hazardous waste accumulated in tanks? If no, skip to c. 262.34 (January 11, 1982 revision)				residual in tank must be tested to determine if haz
i. Is each tank labeled or marked clearly with the words "Hazardous Wastes"? 262.34 (January 1982 revision)				
ii. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192				
iii. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?				
iv. Do continuous feed systems have a waste-feed cutoff?				
v. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193				
vi. Are required daily and weekly inspections done? 265.194				
vii. Are reactive and ignitable wastes in tanks protected or rendered non-reactive or nonignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or nonignitable, see treatment requirements.) 265.198				
viii. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply.) 265.199				

	Yes	No	NI	Remarks

ix. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(see tables 2-1 through 2-6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

c. Is hazardous waste accumulated in other than tanks or containers? ___ ✓ ___ _____

d. Personnel training. 262.34 (a) 5

No personnel trai

Do personnel training records include: 265.16

i. Job Titles? ___ ___ ___ _____

ii. Job Descriptions? ___ ___ ___ _____

iii. Description of training? ___ ___ ___ _____

iv. Records of training? ___ ___ ___ _____

v. Did personnel receive the required training by 5-19-81? ___ ___ ___ _____

vi. Do new personnel receive required training within six months? ___ ___ ___ _____

vii. Do personnel training records indicate that personnel have taken part in an annual review of initial training? ___ ___ ___ _____

e. Preparedness and Prevention 265. Subpart C

i. Maintenance and Operation of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? 265.31 ___ ___ ___ _____

	Yes	No	NI	Remarks
ii. If required, does this facility have the following equipment: 265.32				
Internal communications or alarm systems?	✓			
Telephone or 2-way Radios at the scene of operations?	✓			
Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓			

Indicate the volume of water and/or foam available for fire control:

City water & company's own supplies

iii. Testing and Maintenance of Emergency Equipment: 265.33				
Has the owner or operator established testing and maintenance procedures for emergency equipment?	✓			contracted out - also have a co. fire brigade
Is emergency equipment maintained in operable condition?	✓			
iv. Has owner/operator provided immediate access to internal alarms (if needed)?	✓			
v. Is there adequate aisle space for unobstructed movement?	✓			
vi. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?	✓			

f. Contingency Plan and Emergency Procedures 265 Subpart D

Does the contingency plan contain the following information:

i. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.) 265.52		✓		

		Yes	No	NI	Remarks
ii.	Arrangements agreed to by local police departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?	✓			
iii.	Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.	✓			
iv.	A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?		✓		
v.	An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes?)		✓		
vi.	Are copies of the Contingency Plan available at site and local emergency organizations?		✓		
vii.	Is the facility emergency coordinator identified?	✓			
viii.	Is coordinator familiar with all aspects of site operation and emergency procedures?	✓			
ix.	Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	✓			
x.	If an emergency situation has occured at this facility, has the emergency coordinator followed the emergency procedures listed in 265.56?				no emerg

Section D: RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	Yes	No	NI	Remarks
(1) Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	✓			

Section E: INTERNATIONAL SHIPMENTS (Part 262 Subpart E)

262.50

Not app.

(1) Has the installation imported or exported hazardous waste? If "no", skip a and b.				
a. Exporting Hazardous Waste, has a generator:				
i. Notified the Administrator in writing?				
ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				
iii. Met the Manifest requirements?				
b. Importing Hazardous Waste, has the generator met the manifest requirements?				

DES 4-22-83
Class Violations
I. & III
Code X

#14172

MID 005 319 009

April 14, 1983

Mr. Marvin Francisco
Checker Motors Corporation
2016 North Pitcher Street
Kalamazoo, Michigan 49007

Dear Mr. Francisco:

On March 16, 1983, staff of the Department of Natural Resources conducted an investigation of your facility located at 2016 North Pitcher Street, Kalamazoo, Michigan, to evaluate compliance of that facility with requirements of Subtitle C of the Federal Resource Conservation and Recovery Act (RCRA) and Michigan's Hazardous Waste Management Act (P.A. 64, 1969).

As a result of that investigation, staff of the Department of Natural Resources have determined that the above facility is in violation of the following requirements:

1. Each container was not clearly marked with the date upon which the period of accumulation began and with the words "Hazardous Wastes" as required by 40 CFR 265.34.

2. Personnel training records did not include the information required by 40 CFR 265.16.

3. The contingency plan did not include all the information required by 40 CFR 265.51 through 265.56.

4. The hazardous waste storage area did not have secondary containment as required by the Part 7 rules of P.A. 64, 1969.

We request that you respond to this letter by May 1, 1983, providing documentation to this office regarding those actions taken to correct these violations.

In the meantime, if you have any questions regarding this matter, please feel free to contact Lynn Spurr at (616) 685-6706.

Sincerely,

HAZARDOUS WASTE DIVISION

Tomas Leep, Supervisor
Plainwell District

By: LS TL
Lynn Spurr
Resource Specialist

TL/LS/sp

Attachment

cc: Bohunsky/Hazardous Waste Division
U.S. EPA
Leep

GES 4-22-83 Class violations - & III Code X

#1472

RCRA Inspection Report

EPA Identification Number: MID 005319009

Installation Name: Checker Motors Corporation

Location Address: 2016 N. Pitcher St.

City: Kalamazoo State: MI

Date of inspection: 3/16/83 Time of inspection (from) 10:00 (to) 4:00

Person(s) interviewed	Title	Telephone
Marvin Francisco	Plant Eng	616-343-6121
Orville Breithaupt	Safety Director	616 " "
Dick Rumbaugh	Foreman, Environmental	" "

Inspector(s)	Agency/Title	Telephone
Lynn M. Spurr	MDNR/Resource Specialist	616-685-6706

Installation Activity (mark only one box) Inspection Form(s)

[ ]	Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation	A
[ ]	Treatment/Storage/Disposal (no generation or Transportation)	A
[ ]	Generation and Transportation	B, C
[X]	Generation only	B
[ ]	Transportation only	C

INSPECTION FORM B

Section A: Scope of inspection

Standards for generators of HAZARDOUS WASTE subject to 40 CFR 262.10

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	Yes	No	NI*	Remarks
(1) Does the generator have copies of the manifest available for review? 262.40	✓			
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.	1			
(3) Do the manifest forms examined contain the following information? (If possible, make copies of, or record information from, manifests that do not contain the critical elements) 262.21				
a. Manifest document number?	✓			
b. Name, mailing address, telephone number, and EPA ID number of generator?	✓			
c. Name and EPA ID number of transporter(s)?	✓			
d. Name, Address, and EPA ID Number of designated permitted facility and alternate facility?	✓			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	✓			
f. The total quantity of waste(s) and the type and number of containers loaded?	✓			
g. Required certification?	✓			
h. Required signatures?	✓			

(4) Reportable exceptions 262.42

a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. 0

b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. _____

Section C - PRE-TRANSPORT REQUIREMENTS
(40 CFR Part 262 Subpart C)

	Yes	No	NI	Remarks
(1) Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	✓			
(2) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site) 262.31 and 262.32	✓			
(3) If required, are placards available to transporter? 262.33	✓			
** (4) Pre-shipment Accumulation:				
a. Is hazardous waste accumulated in containers? If no, skip to b. 262.34	✓			
i. Is each container clearly marked with the date on which the period of accumulation began?		✓		
ii. Have more than 90 days elapsed since the dates marked?		✓		
iii. Is each container labeled or marked clearly with the words "Hazardous Wastes?"		✓		
iv. Are containers in good condition?	✓			
v. Are containers compatible with waste in them?	✓			
vi. Are containers managed to prevent leaks?	✓			
vii. Are containers stored closed?	✓			
viii. Are containers inspected weekly for leaks and defects?	✓			
ix. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	✓			

** applies only to GENERATORS that store hazardous waste on-site for 90 days or less without a permit. These items do not apply to generators whose waste is immediately transported off-site.

	Yes	No	NI	Remarks
x. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)				N/A
xi. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?				N/A
b. Is hazardous waste accumulated in tanks? If no, skip to c. 262.34 (January 11, 1982 revision)		✓		
i. Is each tank labeled or marked clearly with the words "Hazardous Wastes"? 262.34 (January 1982 revision)				
ii. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192				
iii. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?				
iv. Do continuous feed systems have a waste-feed cutoff?				
v. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193				
vi. Are required daily and weekly inspections done? 265.194				
vii. Are reactive and ignitable wastes in tanks protected or rendered non-reactive or nonignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or nonignitable, see treatment requirements.) 265.198				
viii. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply.) 265.199				

	Yes	No	NI	Remarks

ix. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(see tables 2-1 through 2-6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

c. Is hazardous waste accumulated in other than tanks or containers? ___ ✓ ___ _____

d. Personnel training. 262.34 (a) 5

Do personnel training records include: 265.16

i. Job Titles? ___ ✓ ___ _____

ii. Job Descriptions? ___ ✓ ___ _____

iii. Description of training? ___ ✓ ___ _____

iv. Records of training? ___ ✓ ___ _____

v. Did personnel receive the required training by 5-19-81? ___ ✓ ___ _____

vi. Do new personnel receive required training within six months? ___ ✓ ___ _____

vii. Do personnel training records indicate that personnel have taken part in an annual review of initial training? ___ ✓ ___ _____

e. Preparedness and Prevention 265. Subpart C

i. Maintenance and Operation of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? 265.31 ___ ✓ ___ _____

	Yes	No	NI	Remarks
ii. If required, does this facility have the following equipment: 265.32				
Internal communications or alarm systems?	✓			
Telephone or 2-way Radios at the scene of operations?	✓			
Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓			

Indicate the volume of water and/or foam available for fire control:

City + company water

iii. Testing and Maintenance of Emergency Equipment: 265.33				
Has the owner or operator established testing and maintenance procedures for emergency equipment?	✓			contracted out - also fire brigade checks
Is emergency equipment maintained in operable condition?	✓			
iv. Has owner/operator provided immediate access to internal alarms (if needed)?	✓			
v. Is there adequate aisle space for unobstructed movement?	✓			
vi. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?	✓			

f. Contingency Plan and Emergency Procedures 265 Subpart D

Does the contingency plan contain the following information:				
i. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.) 265.52		✓		

		Yes	No	NI	Remarks
ii.	Arrangements agreed to by local police departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?	✓			
iii.	Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.	✓			
iv.	A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?		✓		
v.	An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes?)		✓		
vi.	Are copies of the Contingency Plan available at site and local emergency organizations?		✓		
vii.	Is the facility emergency coordinator identified?	✓			
viii.	Is coordinator familiar with all aspects of site operation and emergency procedures?	✓			
ix.	Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	✓			
x.	If an emergency situation has occured at this facility, has the emergency coordinator followed the emergency procedures listed in 265.56?				no emergency to date

Section D: RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	Yes	No	NI	Remarks
(1) Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	✓			

Section E: INTERNATIONAL SHIPMENTS (Part 262 Subpart E)
262.50

(1) Has the installation imported or exported hazardous waste? If "no", skip a and b.		X		
a. Exporting Hazardous Waste, has a generator:				
i. Notified the Administrator in writing?				
ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				
iii. Met the Manifest requirements?				
b. Importing Hazardous Waste, has the generator met the manifest requirements?				

STATE IDENTIFICATION NUMBER
(If Applicable)

MID005319009
EPA IDENTIFICATION NUMBER

262.12

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
Form B Generator Inspection*
(40 CFR Part 262)

SEP 21 1981
ACT 64

I. General Information:*

(A) Installation Name: Checker Motors Corp.

(B) Street: 2016 N. Pitcher St.

(C) City: Kalamazoo (D) State: MI (E) Zip Code: 49007

(F) Phone: 616-343-6121 (G) County: Kalamazoo

(H) Date of Inspection: 09/15/81 Time of Inspection (From) 9:43 A. (To) 11:00 A.M.

(I) Weather Conditions: ptly cldy,

(J) Person(s) interviewed	Title	Telephone
Orville Breithaupt	Cost Reduction Co-ord.	(616) 343-6121
Dick Rumbaugh		(616) 343-6121
Marvin Francisco	Plant Engineer	(616) 343-6121

(K) Inspection Participants	Agency/Title	Telephone
Calvin Peters	DNR-AQD, Resource Spec.	616-685-6706
Richard Vande Bunt	DNR-AQD, Dist. Engineer	616-685-6706

(L) Preparer Information

Name	Agency/Title	Telephone
Richard Vande Bunt	DNR-AQD, Dist. Engineer	616-685-6706
Calvin Peters	DNR-AQD, Resource Spec.	616-685-6706

*Do not use this form if Generator is also a treatment, storage, and/or disposal facility. Complete form "A" if the Generator is also a TSD facility.

Rev. 1-27-81/J.B.

II. BRIEFLY DESCRIBE SITE ACTIVITY

Automotive steel stamping, steel assembly and associated finishing (painting) operations involved in the production of Automobiles.

III. MANIFEST REQUIREMENTS
(Subpart B)

		Yes	No	NI*	Remarks
(A)	Does the operator have copies of the manifest available for review? 262.23(a)3	X			
(B)	Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifests that do not contain the critical elements)				
1.	Manifest document number? 262.21(a)1	X			
2.	Name, mailing address, telephone number, and EPA ID number of Generator? 262.21(a)2	X			
3.	Name and EPA ID Number of Transporter(s)? 262.21(a)3	X			
4.	Name, Address, and EPA ID Number of Designated permitted facility and alternate facility? 262.21(a)4		X		no provision for alternate facility on manifest form.

*Not Inspected

5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)? 262.21(a)5 DOT information in CFR 49 172.101, 172.202 and 172.203	X				
6. The total quantity of waste(s) and the type and number of containers loaded? 262.21(a)6	X				
7. Required Certification? 262.21(b)	X				
8. Required Signatures? 262.23(a)1	X				
(C) Does the Owner or Operator Submit Exception Reports when Needed? 262.42			X		

IV. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site) 262.30 49 CFR Parts 173.178 and 179	X				
(B) Are waste packages marked and labeled in accordance with DOT Regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site) 262.31 49 CFR Part 172	X				
(C) If required, are placards available to transporter? 262.33 49 CFR Part 172, Subpart F	X				
(D) Pre-shipment Accumulation:					
1. Are containers marked with start of accumulation date? 262.34(a)3		X		facility has requested permit for storage (over 90 days)	
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days? 262.34(a)1 If no, the facility must be storage or disposal facility 262.34(b)	X			26 drums of paint waste currently stored on site as of 09/15/81	

*Not Inspected

3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from facility's property line?	X			inspected daily
4. If wastes are stored in tanks, are the tanks managed according to the following requirements:				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank? 265.192(b)	X			
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures? 265.192(c)	X			
c. Do continuous feed systems have a waste-feed cutoff? 265.192(d)	X			
d. Are required daily and weekly inspections done? 265.194	X			
e. Are reactive and ignitable wastes in tanks protected from sources of reaction and ignition, or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements 265.198, 265.17	X			Is waste ☒ Ignitable or ☐ Reactive ?
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply) 265.199	N/A		X	one type of waste only stored in bulk tank.
g. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reaction wastes?	X			

*Not Inspected

Record the following information:

Tank capacity? 1100 gallons

Tank diameter? 4.0 feet

Distance of tank from property line? 250-300 feet

(see tables 2-1 through 2-6 of NEPA's "Flammable and Combustible Code - 1977" to determine compliance)

V Training, Emergency Procedures

	YES	NO	*N	Remarks
A. Do Personnel training records include: (Effective 5/19/81) 265.16				
1. Job Titles? 265.16(d)1		X		facility is in the process of
2. Job Descriptions 265.16(d)		X		formulating a training program
3. Description of training? 265.16(d)3		X		
4. Records of training? 265.16(d)4		X		
5. Have facility personnel received required training by 5-19-81		X		
6. Do new personnel received required training within six months		X		
B. Prepardness and Prevention (Part 265, Subpart C)				
1. Maintenance and Operation of Facility. 265.31				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? 265.31		X		

*Not Inspected

2. If required, does this facility have the following equipment: X

   a. Internal communications or alarm systems? 265.32(a) X
   b. Telephone or 2-way Radios at the scene of operations? 265.32(b) X
   c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? 265.32(c) X

Indicate the volume of water and/or foam available for fire control 265.32(d)
Units: City water (fire), plant (well) water, booster (diesel) pump 2250 gal/min on plant pumps - city mains are 6".

3. Testing and Maintenance of Emergency Equipment:

   a. Has the Owner or Operator established testing and Maintenance Procedures for Emergency Equipment 265.33 X
   b. Is emergency equipment Maintained in Operable Condition? 265.33 X

4. Has Owner/Operator provided immediate access to internal alarms (if needed)? 265.34(a) X
5. Is there adequate aisle space for unobstructed movement? 265.35 X

C. Contingency Plan and Emergency Procedure (Part 265, Subpart D) 265.37

*Not Inspected

1. Does the contingency plan contain the following:

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part as applicable)	—	X	— Company will submit SPIP and/or modify plan w/ provisions for Hazardous Waste problems.
b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?	—	X	—
c. Names, Addresses, and Phone numbers (Office and Home) of all persons qualified to act as emergency coordinator. 265.52(d)	—	X	—
d. A list of all emergency equipment at the facility which include the location and physical description of each item on the list, and a brief outline of its capabilities? 265.52(e)	—	X	—
e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes. 265.52(f)	—	X	—

*Not Inspected

2. Are copies of the Contingency Plan available at site and location Emergency Organizations? 265.53 — X —

3. Emergency Coordinator 265.55

   a. Is the Facility Emergency Coordinator Identified? — X —

   b. Is coordinator famaliar with all aspects of site operation and emergency procedures? — X —

   c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan

4. Emergency

   If an emergency situation has occured at this facility; has the emergency coordinator followed the emergency procdures listed in §265.56? — X —

VI. RECORDKEEPING AND REPORTING
(Part 262, Subpart D)

(A) Are Manifests, Annual Reports, Exception Reports, and All Test Results and Analyses Retained for at least three years? 265.71(a)5 — — X — no reports over one year old Co. will retain records

(B) Has the Generator submitted Annual Reports and Exception Reports as required? — X — not applicable (as above)

VII. INTERNATIONAL SHIPMENTS
(Part 262 Subpart E)

(A) Has the Installation Imported or Exported Hazardous Waste? 262.50 — X —

(If A was answered Yes, then complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:

   a. Notified the Administrator in writing? 262.50(b)1 — — X Not applicable

   b. Obtained the Signature of the foreign consignee confirming delivery of the waste(s) in the foreign country? 262.50(b)2 — — X n.A.

   c. Met the Manifest requirements? 262.50(b)3 — — X n.A.

2. Importing Hazardous Waste, has the generator: 262.50(b)3 — — X n.A.

   a. Met the manifest requirements?

VIII. Remarks

REMARKS:

STATE OF MICHIGAN

WASTE DISPOSAL MANIFEST

☒ Act 64 Waste (HAZARDOUS) ☐ N/A Act 136 Waste ☐ N/A Other MI 031880

Rev. 8/81

IDENTIFICATION

Generator's Name	Primary Transporter's Name	Treatment, Storage or Disposal Facility
Checker Motors Corporation	A-1 Disposal Corporation	Chem-Met Services, Inc.
Site Address	**Transporters Address**	**Facility Address**
2016 North Pitcher Street Kalamazoo, Michigan 49007	PO Box 248/400 Broad Street Plainwell, Michigan 49080	18550 Allen Road Wyandotte, Michigan 48192
Phone Number	**Phone Number**	**Phone Number**
(616) 343-6121 Bob Barnes	(616) 685-9801	(313) 282-9250 Tom Sullivan or Roy Dane
Generator's Site EPA I.D. Number	**Transporter's EPA I.D. Number**	**Facility Site EPA I.D. Number**
MID005319009	MID059695452	MID096963194

If more than one Transporter is to be utilized, give the Name and EPA I.D. Number of each:

WASTE INFORMATION

LOT NO.	U.S. D.O.T. Shipping Name (or common name if there is no D.O.T. shipping name).	D.O.T. Hazard Class	U.N./N.A. No.	Haz. Class Code	Container No.	Container Type	Form: Solid	Form: Liquid	Form: Gas	Form: Sludge	Total Weight or Volume	Units	Hazardous or Liquid Waste Number
1.	Waste Flammable liquid, n.o.s. (Waste Polymer sealants & mixed solvents)	Flammable liquid	UN1993	07	2	DR				X	000110	gal	D001
2.													
3.													
4.													
5.													
6.													

COMMENTS

Include Safety precautions and special handling instructions.

Contain material & telephone 616/343-6121
Analysis #2144-83 'A'

GENERATOR CERTIFICATION: I certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and U.S. EPA. I further certify that the information contained on the manifest is factual. I understand that the failure to accurately report all information requested by the manifest constitutes a violation of 1979 PA64 and/or 1969 PA136. I further understand that this manifest may be used in administrative and court proceedings.

Generator Signature ①

Date Shipped MO. DAY YEAR 6/24/83

HAULER'S CERTIFICATION: I certify acceptance of the above identified wastes for transportation. I further certify that I shall deliver the hazardous wastes, together with this manifest, only to the destination specified by the generator on this manifest. I understand that this manifest can be used in administrative end court proceedings.

Transporter Vehicle I.D. No. No. 1

Subsequent Transporter Vehicle I.D. No's

Transporter Signature ②

Subsequent transporter(s) signature(s) ③

Date(s) Received 6/24/83

If the shipment cannot be delivered, describe the reasons for non-delivery.

TSDF CERTIFICATIDN: I certify receipt at this facility of the above identified wastes and that this facility is licensed to accept those wastes. I also certify that the wastes were accompanied by a manifest properly certified by both the generator and hauler and that this facility is the destination indicated on the manifest. I understand that this manifest can be used in administrative and court proceedings.

TSDF Signature ④

Facility Site EPA I.D. Number

☐ Accepted ☐ Rejected

Date Received 6/25/83

Describe any significant discrepancies between manifest and shipment.

Was a Surcharge Assessed? ☐ Yes ☐ No

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 800—292-4706 OR OUT-OF-STATE AT 517—373-7660 AND THE NATIONAL RESPONSE CENTER AT 800—424-8802 24 HOURS PER DAY.

GENERATOR 2ND COPY

STATE OF MICHIGAN

RCRA NON-HAZARDOUS & NON-NOTIFICATION MATERIAL

Rev. 9/81

WASTE DISPOSAL MANIFEST

N/A ☐ Act 64 Waste (HAZARDOUS) N/A ☐ Act 136 Waste *☒ Other MI 031881

IDENTIFICATION

Generator's Name	Primary Transporter's Name	Treatment, Storage or Disposal Facility
Checker Motors Corporation	A-1 Disposal Corporation	Chem-Met Services, Inc.
Site Address	**Transporters Address**	**Facility Address**
2015 North Pitcher Street Kalamazoo, Michigan 49007	PO Box 248/400 Broad Street Plainwell Michigan 49080	18550 Allen Road Wyandotte, Michigan 48192
Phone Number	**Phone Number**	**Phone Number**
(616) 343-6121 Bob Barnes	(616) 685-9501	(313) 282-9250 Bruce Smith
Generator's Site EPA I.D. Number	**Transporter's EPA I.D. Number**	**Facility Site EPA I.D. Number**
MID005319009	MID059695452	MID096963194

If more than one Transporter is to be utilized, give the Name and EPA I.D. Number of each:

WASTE INFORMATION

LOT NO.	U.S. D.O.T. Shipping Name (or common name if there is no D.O.T. shipping name).	D.O.T. Hazard Class	U.N./N.A. No.	Haz. Class Code	Container No.	Container Type	Form: Solid	Form: Liquid	Form: Gas	Form: Sludge	Total Weight or Volume	Units	Hazardous or Liquid Waste Number
1.	NOT CLASSIFIED (Waste Zinc Filter Cake)	NONE	NONE	--	//	DR	X				600	gal	--
2.													
3.													
4.													
5.													
6.													

COMMENTS

Include Safety precautions and special handling instructions.

Contain material & telephone 616/343-6121
Analysis #2226-83

GENERATOR CERTIFICATION: I certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and U.S. EPA. I further certify that the information contained on the manifest is factual. I understand that the failure to accurately report all information requested by the manifest constitutes a violation of 1979 PA64 and/or 1969 PA136. I further understand that this manifest may be used in administrative and court proceedings.

Generator Signature ①

Date Shipped MO. DAY YEAR 02/15/

HAULER'S CERTIFICATION: I certify acceptance of the above identified wastes for transportation. I further certify that I shall deliver the hazardous wastes, together with this manifest, only to the destination specified by the generator on this manifest. I understand that this manifest can be used in administrative and court proceedings.

Transporter Vehicle I.D. No. No. 1

Subsequent Transporter Vehicle I.D. No's

Transporter Signature ②

Subsequent transporter(s) signature(s) ③

Date(s) Received

If the shipment cannot be delivered, describe the reasons for non-delivery.

TSDF CERTIFICATION: I certify receipt at this facility of the above identified wastes and that this facility is licensed to accept those wastes. I also certify that the wastes were accompanied by a manifest properly certified by both the generator and hauler and that this facility is the destination indicated on the manifest. I understand that this manifest can be used in administrative and court proceedings.

TSDF Signature ④

Facility Site EPA I.D. Number

☐ Accepted ☐ Rejected

Date Received 2/16/

Describe any significant discrepancies between manifest and shipment.

Was a Surcharge Assessed? ☐ Yes ☐ No

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 800—292-4706 OR OUT-OF-STATE AT 517—373-7660 AND THE NATIONAL RESPONSE CENTER AT 800—424-8802 24 HOURS PER DAY.

GENERATOR 2ND COPY

STATE OF MICHIGAN

WASTE DISPOSAL MANIFEST

R 4000 Rev. 8/81

☒ Act 64 Waste (HAZARDOUS) ☐ N/A Act 136 Waste ☐ N/A Other

MI 031881

IDENTIFICATION

Generator's Name	Primary Transporter's Name	Treatment, Storage or Disposal Facility
Checker Motors Corporation	A-1 Disposal Corporation	Chem-Met Services, Inc.
Site Address	**Transporters Address**	**Facility Address**
2016 North Pitcher Street Kalamazoo, Michigan 49007	PO Box 248/400 Broad Street Plainwell, Michigan 49080	18550 Allen Road Wyandotte, Michigan 48192
Phone Number	**Phone Number**	**Phone Number**
(616) 343-6121 Bob Barnes	(616) 685-9801	(313) 282-9250 Tom Sullivan or Roy Dane
Generator's Site EPA I.D. Number	**Transporter's EPA I.D. Number**	**Facility Site EPA I.D. Number**
MID005319009	MID059695452	MID096963194

If more than one Transporter is to be utilized, give the Name and EPA I.D. Number of each:

WASTE INFORMATION

LOT NO.	U.S. D.O.T. Shipping Name (or common name if there is no D.O.T. shipping name).	D.O.T. Hazard Class	U.N./N.A. No.	Haz. Class Code	Container No.	Container Type	Form: Solid	Form: Liquid	Form: Gas	Form: Sludge	Total Weight or Volume	Units	Hazardous or Liquid Waste Number
1.	Waste Flammable liquid, n.o.s. (Waste polymers, resins, & mixed solvents)	Flammable liquid	UN1993	07	1	DR		X				gal	D001*
2.													
3.													
4.													
5.													
6.													

COMMENTS

Include Safety precautions and special handling instructions.

Contain material & telephone 616/343-6121

*Addn'l hazardous waste numbers: D005, D007, D008 & 003D

GENERATOR CERTIFICATION: I certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and U.S. EPA. I further certify that the information contained on the manifest is factual. I understand that the failure to accurately report all information requested by the manifest constitutes a violation of 1979 PA64 and/or 1969 PA136. I further understand that this manifest may be used in administrative and court proceedings.

Generator Signature ①

Date Shipped MO. DAY YEAR 6/16/83

HAULER'S CERTIFICATION: I certify acceptance of the above identified wastes for transportation. I further certify that I shall deliver the hazardous wastes, together with this manifest, only to the destination specified by the generator on this manifest. I understand that this manifest can be used in administrative and court proceedings.

Transporter Vehicle I.D. No. No. 1

Subsequent Transporter Vehicle I.D. No's

Transporter Signature ②

Subsequent transporter(s) signature(s) ③

Date(s) Received

If the shipment cannot be delivered, describe the reasons for non-delivery.

TSDF CERTIFICATION: I certify receipt at this facility of the above identified wastes and that this facility is licensed to accept those wastes. I also certify that the wastes were accompanied by a manifest properly certified by both the generator and hauler and that this facility is the destination indicated on the manifest. I understand that this manifest can be used in administrative and court proceedings.

TSDF Signature ④

Facility Site EPA I.D. Number

☒ Accepted ☐ Rejected

Date Received 7/14/83

Describe any significant discrepancies between manifest and shipment.

Was a Surcharge Assessed? ☐ Yes ☐ No

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 800—292-4706 OR OUT-OF-STATE AT 517—373-7660 AND THE NATIONAL RESPONSE CENTER AT 800—424-8802 24 HOURS PER DAY.

GENERATOR 2ND COPY

R 4696
Rev. 9/81

STATE OF MICHIGAN

WASTE DISPOSAL MANIFEST

N/A ☐ Act 64 Waste (HAZARDOUS) ☒ Act 136 Waste N/A ☐ Other

MI 031567

IDENTIFICATION

Generator's Name	Primary Transporter's Name	Treatment, Storage or Disposal Facility
Checker Motors Corporation	A-1 Disposal Corporation	Chem-Met Services, Inc.
Site Address	**Transporters Address**	**Facility Address**
2016 North Pitcher Street Kalamazoo, Michigan 49007	PO Box 249/400 Broad Street Plainwell, Michigan 49080	18550 Allen Road Wyandotte, Michigan 48192
Phone Number	**Phone Number**	**Phone Number**
(616) 343-6121 Bob Barnes	(616) 685-9801	(313) 282-9250 Tom Sullivan or Roy Dan
Generator's Site EPA I.D. Number	**Transporter's EPA I.D. Number**	**Facility Site EPA I.D. Number**
M I D 0 0 5 3 1 9 0 0 9	M I D 0 5 9 6 9 5 4 5 2	M I D 0 9 6 9 6 3 1 9 4

If more than one Transporter is to be utilized, give the Name and EPA I.D. Number of each:

GENERATOR COMPLETES

WASTE INFORMATION

LOT NO.	U.S. D.O.T. Shipping Name (or common name if there is no D.O.T. shipping name).	D.O.T. Hazard Class	U.N./N.A. No.	Haz. Class Code	Container No.	Container Type	Form: Solid	Form: Liquid	Form: Gas	Form: Sludge	Total Weight or Volume	Units	Hazardous or Liquid Waste Number
1.	NOT CLASSIFIED (Waste polymer sealants, adhesives & aqueous solution)	NONE	NONE	-- --	1	DM				X	10	gal	0 1 6 1
2.													
3.													
4.													
5.													
6.													

COMMENTS

Include Safety precautions and special handling instructions.

Contain material & telephone 616/343-6121
Analysis #2165-83 Comp A

GENERATOR CERTIFICATION: I certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and U.S. EPA. I further certify that the information contained on the manifest is factual. I understand that the failure to accurately report all information requested by the manifest constitutes a violation of 1979 PA64 and/or 1969 PA136. I further understand that this manifest may be used in administrative and court proceedings.

Generator Signature ①

Date Shipped MO. DAY YEAR

TRANSPORTER COMPLETES

HAULER'S CERTIFICATION: I certify acceptance of the above identified wastes for transportation. I further certify that I shall deliver the hazardous wastes, together with this manifest, only to the destination specified by the generator on this manifest. I understand that this manifest can be used in administrative and court proceedings.

Transporter Vehicle I.D. No. **No. 1**

Transporter Signature ②

Date(s) Received

Subsequent Transporter Vehicle I.D. No's

Subsequent transporter(s) signature(s) ③

If the shipment cannot be delivered, describe the reasons for non-delivery.

TSDF COMPLETES

TSDF CERTIFICATION: I certify receipt at this facility of the above identified wastes and that this facility is licensed to accept those wastes. I also certify that the wastes were accompanied by a manifest properly certified by both the generator and hauler and that this facility is the destination indicated on the manifest. I understand that this manifest can be used in administrative and court proceedings. ④

TSDF Signature

☐ Accepted ☐ Rejected

Date Received

Facility Site EPA I.D. Number

Describe any significant discrepancies between manifest and shipment.

Was a Surcharge Assessed? ☐ Yes ☐ No

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 800—292-4706 OR OUT-OF-STATE AT 517—373-7660 AND THE NATIONAL RESPONSE CENTER 800—424-8802 24 HOURS PER DAY.

GENERATOR 2ND COPY

*RCRA NON-HAZARDOUS & NON-NOTIFICATION

R 4898
Rev. 6/81

STATE OF MICHIGAN

WASTE DISPOSAL MANIFEST

N/A ☐ Act 64 Waste (HAZARDOUS) N/A ☐ Act 136 Waste *☒ Other MI0186374

IDENTIFICATION

Generator's Name	Primary Transporter's Name	Treatment, Storage or Disposal Facility
Checker Motors Corporation	A-1 Disposal Corporation	Orchard Hills Sanitary Landfill Landfill Management
Site Address	**Transporters Address**	**Facility Address**
2016 North Pitcher Street Kalamazoo, Michigan 49007	PO Box 248/400 Broad Street Plainwell, Michigan 49080	3378 Hennessey Road Watervliet, Michigan 49096
Phone Number	**Phone Number**	**Phone Number**
(616) 343-6121 Bob Barnes	(616) 685-9801	(616) 463-5588
Generator's Site EPA I.D. Number	**Transporter's EPA I.D. Number**	**Facility Site EPA I.D. Number**
MID005319009	MID059695452	MIP000000072

If more than one Transporter is to be utilized, give the Name and EPA I.D. Number of each:

WASTE INFORMATION

LOT NO.	U.S. D.O.T. Shipping Name (or common name if there is no D.O.T. shipping name).	D.O.T. Hazard Class	U.N./N.A. No.	Haz. Class Code	Container No.	Container Type	Form Solid	Form Liquid	Form Gas	Form Sludge	Total Weight or Volume	Units	Hazardous or Liquid Waste Number
1.	NOT CLASSIFIED (Waste caulk and adhesive #1)	NONE	NONE		1	DR	X					gal	
2.													
3.													
4.													
5.													
6.													

COMMENTS

Include Safety precautions and special handling instructions:
Contain material & telephone 616/343-6121

Analysis #2165-83 Comp 'A'

GENERATOR CERTIFICATION: I certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and U.S. EPA. I further certify that the information contained on the manifest is factual. I understand that the failure to accurately report all information requested by the manifest constitutes a violation of 1979 PA64 and/or 1969 PA136. I further understand that this manifest may be used in administrative and court proceedings.

Generator Signature ①

Date Shipped MO. DAY YEAR

HAULER'S CERTIFICATION: I certify acceptance of the above identified wastes for transportation. I further certify that I shall deliver the hazardous wastes, together with this manifest, only to the destination specified by the generator on this manifest. I understand that this manifest can be used in administrative and court proceedings.

Transporter Vehicle I.D. No. No. 1 223-15

Subsequent Transporter Vehicle I.D. No's 215-1

Transporter Signature ②

Subsequent Transporter(s) Signature(s) ③

Date(s) Received 06/16/83

If the shipment cannot be delivered, describe the reasons for non-delivery.

TSDF CERTIFICATION: I certify receipt at this facility of the above identified wastes and that this facility is licensed to accept those wastes. I also certify that the wastes were accompanied by a manifest properly certified by both the generator and hauler and that this facility is the destination indicated on the manifest. I understand that this manifest can be used in administrative and court proceedings.

TSDF Signature ④

Facility Site EPA I.D. Number

☒ Accepted ☐ Rejected

Date Received

Describe any significant discrepancies between manifest and shipment.

Was a Surcharge Assessed? ☐ Yes ☐ No

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 800--292-4706 OR OUT-OF-STATE AT 517--373-7660 AND THE NATIONAL RESPONSE CENTER AT 800--424-8802 24 HOURS PER DAY.

GENERATOR 2ND COPY

STATE OF MICHIGAN

R 4896
Rev. 6/81

WAST DISPOSAL MANIFEST

☒ Act 64 Waste (HAZARDOUS) N/A ☐ Act 136 Waste N/A ☐ Other

MI0186372

IDENTIFICATION

Generator's Name	Primary Transporter's Name	Treatment, Storage or Disposal Facility
Checker Motors Corporation	A-1 Disposal Corporation	A-1 Disposal Corporation
Site Address	**Transporters Address**	**Facility Address**
2016 North Pitcher Street Kalamazoo, Michigan 49007	PO Box 248/400 Broad Street Plainwell, Michigan 49080	PO Box 248/400 Broad Street Plainwell, Michigan 49080
Phone Number	**Phone Number**	**Phone Number**
(616) 343-6121 Bob Barnes	(616) 685-9801	(616) 685-9801
Generator's Site EPA I.D. Number	**Transporter's EPA I.D. Number**	**Facility Site EPA I.D. Number**
MIDO053190 09	MIDO596954 52	MIDO596954 52

If more than one Transporter is to be utilized, give the Name and EPA I.D. Number of each:

WASTE INFORMATION

LOT NO	U.S. D.O.T. Shipping Name (or common name if there is no D.O.T. shipping name).	D.O.T. Hazard Class	U.N./N.A. No.	Haz. Class Code	Container No.	Container Type	Form: Solid	Form: Liquid	Form: Gas	Form: Sludge	Total Weight or Volume	Units	Hazardous or Liquid Waste Number
1.	Waste Flammable liquid, n.o.s. (Waste Adhesive)	Flammable liquid	UN1993	07	1	DR		X				gal	D001
2.													
3.													
4.													
5.													
6.													

COMMENTS

Include Safety precautions and special handling instructions.
Contain material & telephone 616/343-6121
Analysis #2156-83 'B'

GENERATOR CERTIFICATION: I certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and U.S. EPA. I further certify that the information contained on the manifest is factual. I understand that the failure to accurately report all information requested by the manifest constitutes a violation of 1979 PA64 and/or 1969 PA136. I further understand that this manifest may be used in administrative and court proceedings.

Generator Signature ①

Date Shipped MO. DAY YEAR

HAULER'S CERTIFICATION: I certify acceptance of the above identified wastes for transportation. I further certify that I shall deliver the hazardous wastes, together with this manifest, only to the destination specified by the generator on this manifest. I understand that this manifest can be used in administrative and court proceedings.

Transporter Vehicle I.D. No. No. 1 223-15

Transporter Signature ② A-1 D.W.

Date(s) Received 06/7/83

Subsequent Transporter Vehicle I.D. No's

Subsequent transporter(s) signature(s) ③

If the shipment cannot be delivered, describe the reasons for non-delivery.

TSDF CERTIFICATION: I certify receipt at this facility of the above identified wastes and that this facility is licensed to accept those wastes. I also certify that the wastes were accompanied by a manifest properly certified by both the generator and hauler and that this facility is the destination indicated on the manifest. I understand that this manifest can be used in administrative and court proceedings.

TSDF Signature ④

☒ Accepted ☐ Rejected

Date Received 06148 3

Facility Site EPA I.D. Number MIDO596954 52

Describe any significant discrepancies between manifest and shipment.

Was a Surcharge Assessed? ☐ Yes ☒ No

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 800—292-4706 OR OUT-OF-STATE AT 517—373-7660 AND THE NATIONAL RESPONSE CENTER AT 800—424-8802 24 HOURS PER DAY.

GENERATOR 2ND COPY

STATE OF MICHIGAN

R 4898
Rev. 8/81

WASTE DISPOSAL MANIFEST

☒ Act 64 Waste (HAZARDOUS) N/A ☐ Act 136 Waste N/A ☐ Other

MI0186371

IDENTIFICATION

Generator's Name	Primary Transporter's Name	Treatment, Storage or Disposal Facility
Checker Motors Corporation	A-1 Disposal Corporation	Chem-Met Services, Inc.
Site Address	**Transporters Address**	**Facility Address**
2016 North Pitcher Street Kalamazoo, Michigan 49007	PO Box 248/400 Broad Street Plainwell, Michigan 49080	18550 Allen Road Wyandotte, Michigan 48192
Phone Number	**Phone Number**	**Phone Number** Tom Sullivan or Roy Dana
(616) 343-6121 Bob Barnes	(616) 685-9801	(313) 282-9230
Generator's Site EPA I.D. Number	**Transporter's EPA I.D. Number**	**Facility Site EPA I.D. Number**
M I D 0 0 5 3 1 9 0 0 9	M I D 0 5 9 6 9 5 4 5 2	M I D 0 9 6 9 6 3 1 9 4

If more than one Transporter is to be utilized, give the Name and EPA I.D. Number of each:

WASTE INFORMATION

LOT NO.	U.S. D.O.T. Shipping Name (or common name if there is no D.O.T. shipping name).	D.O.T. Hazard Class	U.N./N.A. No.	Haz. Class Code	Container No.	Container Type	Form Solid	Form Liquid	Form Gas	Form Sludge	Total Weight or Volume	Units	Hazardous or Liquid Waste Number
1.	Waste Flammable liquid, n.o.s. (Waste Polymer sealants & mixed solvents)	Flammable liquid	UN1993	07	12	DR				X	1112	gal	D001*
2.	Waste Flammable liquid, n.o.s. (Waste Polymers, resins, & mixed solvents)	Flammable liquid	UN1993	07	4	DR		X			440	gal	D001*
3.	Waste Flammable liquid, n.o.s. (Adhesive sludge)	Flammable liquid	UN1993	07	12	DR				X	660	gal	D001
4.	Hazardous waste, solid, n.o.s. (Waste electroplating & paint sludge)	ORM-E	NA9189	12	1	DR	X				55	gal	F006
5.													
6.													

COMMENTS

Include Safety precautions and special handling instructions. Contain material & telephone 616/343-6121 Lot #4: Analysis 2144-83 'C'

Lot #1: Analysis #2144-83 'A'
Lot #2: Analysis #2144-83 'B' and*Addn'l hazardous waste numbers: D005, D007, D008 & 003D
Lot #3: Analysis #2156-83 'A'

GENERATOR CERTIFICATION: I certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and U.S. EPA. I further certify that the information contained on the manifest is factual. I understand that the failure to accurately report all information requested by the manifest constitutes a violation of 1979 PA64 and/or 1969 PA136. I further understand that this manifest may be used in administrative and court proceedings.

Generator Signature ① [signature] Date Shipped MO. DAY YEAR 06 19 85

HAULER'S CERTIFICATION: I certify acceptance of the above identified wastes for transportation. I further certify that I shall deliver the hazardous wastes, together with this manifest, only to the destination specified by the generator on this manifest. I understand that this manifest can be used in administrative and court proceedings.

Transporter Vehicle I.D. No. No. 1 223-15

Transporter Signature ② [signature] Date(s) Received 06 19 85

Subsequent Transporter Vehicle I.D. No's

Subsequent transporter(s) signature(s) ③

If the shipment cannot be delivered, describe the reasons for non-delivery.

TSDF CERTIFICATION: I certify receipt at this facility of the above identified wastes and that this facility is licensed to accept these wastes. I also certify that the wastes were accompanied by a manifest properly certified by both the generator and hauler and that this facility is the destination indicated on the manifest. I understand that this manifest can be used in administrative and court proceedings.

TSDF Signature ④

☐ Accepted ☐ Rejected

Date Received

Facility Site EPA I.D. Number

Describe any significant discrepancies between manifest and shipment.

Was a Surcharge Assessed? ☐ Yes ☐ No

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM IN MICHIGAN AT 800—292-4706 OR OUT-OF-STATE AT 517—373-7660 AND THE NATIONAL RESPONSE CENTER AT 800—424-8802 24 HOURS PER DAY.

GENERATOR 2ND COPY

HRE-8J

JUN 17 1993

Mr. Dick Rumbaugh
Environmental Coordinator and Plant Engineer
Checker Motors Corporation
2016 Pitcher Street
Kalamazoo, Michigan 49007

Re: Checker Motors Corporation
MID 005 319 009

Dear Mr. Rumbaugh:

Enclosed please find a copy of the Preliminary Assessment/Visual Site Inspection for the referenced facility.

The executive summary and conclusions and recommendations section have been withheld as enforcement confidential.

If you have any questions, please contact me at (312) 886-4448.

Sincerely yours,

ORIGINAL SIGNED BY
KEVIN M. PIERARD

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

Enclosure

HRE-8J:FHARRIS:6-2884:6/16/93:RESPONSE/MASTER.RES/LIST4

OFFICIAL FILE COPY

CONCURRENCE REQUESTED FROM REB

OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
	6/16/93	6/16/93	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF: 5HR-12

September 26, 1991

Dick Rumbaugh
Checker Motors
2016 Pitcher Street
Kalamazoo, MI 49007

Re: Visual Site Inspection
Checker Motors
2016 Pitcher Street
MID 005 319 009

Dear Mr. Rumbaugh:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment and Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA). The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern to make a cursory determination of their condition by visual observation. The VSI supplements and updates data gathered during a preliminary file review. During this site visit, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site visit is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of units at the facility and the waste management practices used.

The VSI has been scheduled for October 7, 1991. The inspection team will consist of Joseph Weslock and Valerie Farrell of Dynamac Corporation, contractors for the U.S. EPA. Representatives of the Michigan Department of Natural Resources may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (3I2) 886-4448 or Sheri Bianchin at (312) 886-4446. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions portion, may be made available upon request.

Sincerely yours,

Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

cc: Ken Burda, Permit Section, MDNR
Dennis Drake, Compliance and Enforcement Section, MDNR

D. Corrective Action

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

CHECKER MOTORS CORPORATION
2016 PITCHER STREET
KALAMAZOO, MI 49007
MID 005 319 009

FINAL REPORT

Prepared for:

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	R05032
EPA Region	:	5
Site No.	:	MID 005 319 009
Date Prepared	:	March 19, 1993
Contract No.	:	68-W9-0006
PRC No.	:	309-R05032MI04
PRC Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
Prepared By	:	Dynamac Corporation
Dynamac Work Assignment Mgr.	:	Joseph Weslock
Telephone No.	:	(312) 466-0222
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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ATTACHMENTS

EXECUTIVE SUMMARY

Dynamac Corporation (Dynamac) performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Checker Motors Corporation (Checker) facility, located in Kalamazoo, Michigan. This report summarizes the results of the PA/VSI and evaluates the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified.

The Checker facility is located at 2016 Pitcher Street in an industrial area in the City of Kalamazoo, Kalamazoo County, Michigan. The facility is approximately 65 acres, with buildings occupying approximately nine of those acres.

Checker began manufacturing entire fleets of taxis and various other automobiles at the facility in 1928. In the mid-1960s, Checker began contract part supply work in addition to automobile manufacturing. These manufacturing processes continued until 1982, when the facility ceased automobile manufacturing processes, and went into contract part supply work exclusively. The facility has continued the exclusive production of exterior metal parts under contract since that time.

Seven wastes are routinely generated by the Checker facility. Oily wastewater, non-contact cooling water, scrap metal, and oily solid waste is generated from stamping and pressing lines. Ignitable waste (D001) is generated from sound deadener and adhesive drum bottoms. Solvent-based paint waste (D001/F003) and waste oil are generated from facility maintenance. In addition, the facility also generated non-routine wastes, including polychlorinated biphenyl (PCB) contaminated material from the removal of PCB-transformers and oil sludge generated at a sludge pit.

Prior to ceasing production of automobiles in 1982, the facility also generated plating wastewater from nickel, chromium, zinc, cadmium, and copper plating lines. After the pH of the plating wastewater was neutralized it was discharged to the Kalamazoo Water Reclamation Plant (KWRP). According to Mr. Dick Rumbaugh of Checker, this waste was not regulated as a hazardous waste.

Until 1982, Checker also generated waste paint filters used to collect overspray from automobile paint lines. No file information was available describing whether the paint filters were considered hazardous waste, the volume generated, the frequency in which they were disposed, or the method of disposal. Mr. Rumbaugh stated that he could not find any records documenting that the paint filters were disposed of as a hazardous waste.

In 1980 the Checker facility submitted a Notification of Hazardous Waste Activity and a Part A permit application (Part A). The Part A identified paint residuals (F017) as the only waste generated at the facility. The facility designated one area located in the southwest corner on the second floor of Plant No. 2 (SWMU No. 7) for storage of hazardous waste. In 1982, the facility withdrew its Part A application, submitted a closure plan, and by 1985 the facility was operating as a small quantity generator. Currently, all

hazardous wastes are accumulated in one of two hazardous waste storage areas for less than 90 days. One area is located on the lower floor of Plant No. 2 (SWMU No. 1) and the other area is located at the former hazardous waste storage area (SWMU No. 7).

Historical releases at the facility include a documented release to surface water from a collection pit full of oily wastewater. No injuries or damage to the environment were reported. The facility was issued a Notice of Violation for the discharge; there is no documentation of a subsequent release to the surface water.

In addition, Checker conducted removal of soils associated with a ruptured railcar fuel tank, a leaking PCB-containing transformer, and with several leaking underground storage tanks (UST) located throughout the facility property. The soil removals were conducted under Michigan Department of Natural Resources (MDNR) oversight.

The PA/VSI identified the following 10 SWMUs and 6 AOCs at the Checker facility:

Solid Waste Management Units

1. Hazardous Waste Drum Storage Area
2. Oily Wastewater Collection Pits
3. Oily Wastewater Sludge Pit
4. Scrap Metal Accumulation Pit
5. 250-Gallon Waste Oil UST
6. Waste Oil Drum Collection Areas
7. Paint Waste Satellite Accumulation Area
8. Four 500-Gallon Waste Oil Aboveground Storage Tanks
9. Oily Material Hopper
10. 1,100-Gallon Waste Oil UST

Areas of Concern

1. Diesel Fuel Oil Spill Area
2. PCB-Containing Transformer Area
3. UST Area No. 1
4. UST Area No. 2
5. UST Area No. 3
6. Taxi Storage Yard

The potential for a future release to surface water from any of the SWMUs or AOCs is low. The potential for a release to the air, soil, and groundwater from SWMU Nos. 2, 4, 6, and 9 is also low.

Dynamac observed a release associated with SWMU Nos. 3, 8, and 10, consisting of stained soil and puddles of water with an oily sheen in the area of these SWMUs (See Photo Nos. 11 and 12). This observed release to the soil presents a potential for release to the groundwater. Area geology facilitates the migration of contaminants through the soil to the groundwater table, which is documented to be as shallow as 5.5 feet below ground surface on the facility property. The surficial geological materials are largely sands and gravels deposited by glacial meltwater streams and the Kalamazoo River. The surficial soils identified during UST investigations at the facility were dark loamy sand with gravelly coarse sand in the subsurface.

AOC No. 6, the Taxi Storage Yard, has a moderate potential for a release to the soil and groundwater. The potential for release from AOC No. 6 exists because fluids such as gasoline, transmission oils, anti-freeze, and brake fluid could leak from the taxis and eventually migrate to the groundwater (See Photo No. 14).

SWMU Nos. 1 and 7 have a high potential for a release to the air. At the time of the VSI, there were open drums containing ignitable and volatile hazardous material in both of these SWMUs (See Photo Nos. 5, 6, 7, and 16). The floor in the area of SWMU No. 1 was stained with a black, grease-like substance (See Photo Nos. 5 and 7). Without sampling this substance, Dynamac could not determine if the substance was nonhazardous waste oil or if it was residual sound deadener from the weekly cleaning of dirty plastic drum liners. Dynamac detected a noticeable odor associated with both of these SWMUs.

There has been documented soil and groundwater contamination in the areas of AOC Nos. 4 and 5. Some contaminated soil has been removed from these areas. Because removal of all contaminated soils has not been verified by EPA or MDNR, the potential for future releases to the soil from AOC Nos. 4 and 5 is moderate. Dynamac notes that there is no documentation of soil or groundwater contamination at AOC No. 3.

Mr. Rumbaugh stated that MDNR approval of the remediation associated with the UST removals at the Checker facility is being withheld pending the results of a local groundwater investigation. Mr. Rumbaugh explained that MDNR is conducting an investigation into a total petroleum hydrocarbon (TPH) contamination problem in the groundwater at and surrounding the Checker facility. Mr. Rumbaugh noted that the area of investigation includes the Checker facility and the upgradient industrial area. No documentation of this investigation was available during the file review at MDNR's offices, or from Checker during the VSI. Dynamac notes that the closest downgradient drinking water well is approximately 4.5 miles away. However, a potential receptor of the local TPH groundwater problem may be cross-gradient wells located as close as one mile away.

The Checker facility has limited access. The entire property is fenced and there is 24-hour security. Receptors of a potential air or soil release from the facility include approximately 350 employees at the facility. The likelihood of persons to consume drinking water contaminated by the site is low. There are no drinking water wells at the facility. Receptors of a potential surface water release include persons who use the Kalamazoo River, located approximately 1,200 feet east of the facility, for fishing or recreational activities downstream from the facility.

Dynamac recommends that the facility clean up the area surrounding SWMU Nos. 3, 8, and 10 and remove all of the visibly stained soil. Checker should drain the taxis of all fluids prior to their storage at AOC No. 6. In the area of SWMU Nos. 1 and 7, the facility should keep any drums used for the accumulation of dirty drum liners and hazardous wastes closed when they are not being filled.

Dynamac notes that Checker has removed USTs at AOC Nos. 3, 4, and 5. However, MDNR has not approved closure of these USTs, pending completion of the local TPH groundwater contamination problem. Dynamac recommends that Checker continue to pursue MDNR approval of its UST closures in conjunction with MDNR's investigation of the local TPH groundwater contamination problem.

Because Dynamac could not find any documentation of clean-up activities related to AOC Nos. 1 and 2 in MDNR files, Dynamac recommends that MDNR obtain and review such documentation to ensure that clean-up activities sufficiently contained the release and that all contaminated material was disposed of properly.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R05032 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in EPA Region 5. PRC assigned Dynamac Corporation (Dynamac), its TES 9 subcontractor, to conduct the PA/VSI for the Checker Motors Corporation (Checker) facility in Kalamazoo, Michigan.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells

- Closed and abandoned units

- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units

- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a non-routine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents in files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all SWMUs, identifying evidence of releases, initially identifying potential sampling locations, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of the PA/VSI of the Checker facility in Kalamazoo, Michigan, RCRA ID No. MID 005 319 009. Dynamac gathered and reviewed information from the Waste Management Division, Air and Surface Water Quality Divisions, and Emergency Response Division files at the Michigan Department of Natural Resources' (MDNR) Plainwell, Michigan District office and from EPA Region 5 RCRA files.

Joseph Weslock, Deborah Hall, and Valerie Farrell of Dynamac conducted the VSI on October 7, 1991. The VSI included an interview with one Checker employee, Mr. Dick Rumbaugh, Environmental Co-Ordinator and Plant Engineer. The VSI also included a walk-through inspection of the facility. Dynamac observed 10 SWMUs and 6 AOCs during the VSI. The VSI is summarized along with 17 inspection photographs in Attachment A. Field notes from the VSI are included in Attachment B.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, release history, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

The Checker facility is located in an industrial area in the City of Kalamazoo, in Kalamazoo County, Michigan (42 degrees, 18 minutes, 43 seconds north latitude; 85 degrees, 34 minutes, 44 seconds west longitude) (Checker, 1980b). The facility is partially located inside the north corporate limits of Kalamazoo, while the remainder is located just outside the corporate limits (See Figure 1).

The facility is approximately 65 acres, with buildings occupying approximately nine of those acres (Checker, 1991b). The facility is bounded by Mosel Road on the north; north of Mosel Road is the City of Kalamazoo nursery (greenhouse). A paper manufacturing plant owned by James River Corporation is located south of the facility. A Conrail railway line serves as the east boundary for the Checker facility, beyond which lies the Kalamazoo Water Reclamation Plant (KWRP). The Kalamazoo River lies immediately east of the KWRP, approximately 1,200 feet east of the Checker facility. Pitcher Street serves as the west boundary of the facility. Another Conrail railway line runs parallel to Pitcher Street, west of the facility. West of this railway line there is other industrial property.

The entire facility property is fenced and is patrolled by security guards 24-hours per day (Checker, 1991b). Access to the facility is from Pitcher Street.

2.2 FACILITY OPERATIONS

The Checker facility is a contracted manufacturer of exterior metal parts to be used in the assembly of automobiles and currently employs approximately 350 persons. Until 1982, the facility also manufactured entire fleets of taxis and various other automobiles (Checker, 1991b).

Automobile manufacturing began at this location in 1922 under the ownership of Hadley-Knight Car Corporation. In 1928, Checker purchased the automobile manufacturing facility, which consisted of only one building. Checker has since expanded the facility and has purchased additional property (Checker, 1991b). The current property layout is shown in Figure 2.

In 1928, Checker began manufacturing various types of automobiles, principally taxis. Checker employed approximately 1,200 persons and was operational for only eight hours per day, five days per week. Operations at the facility included production processes associated with all phases of automobile manufacturing, i.e. total car production. Approximately 5,000 automobiles were produced annually (Checker, 1991b).

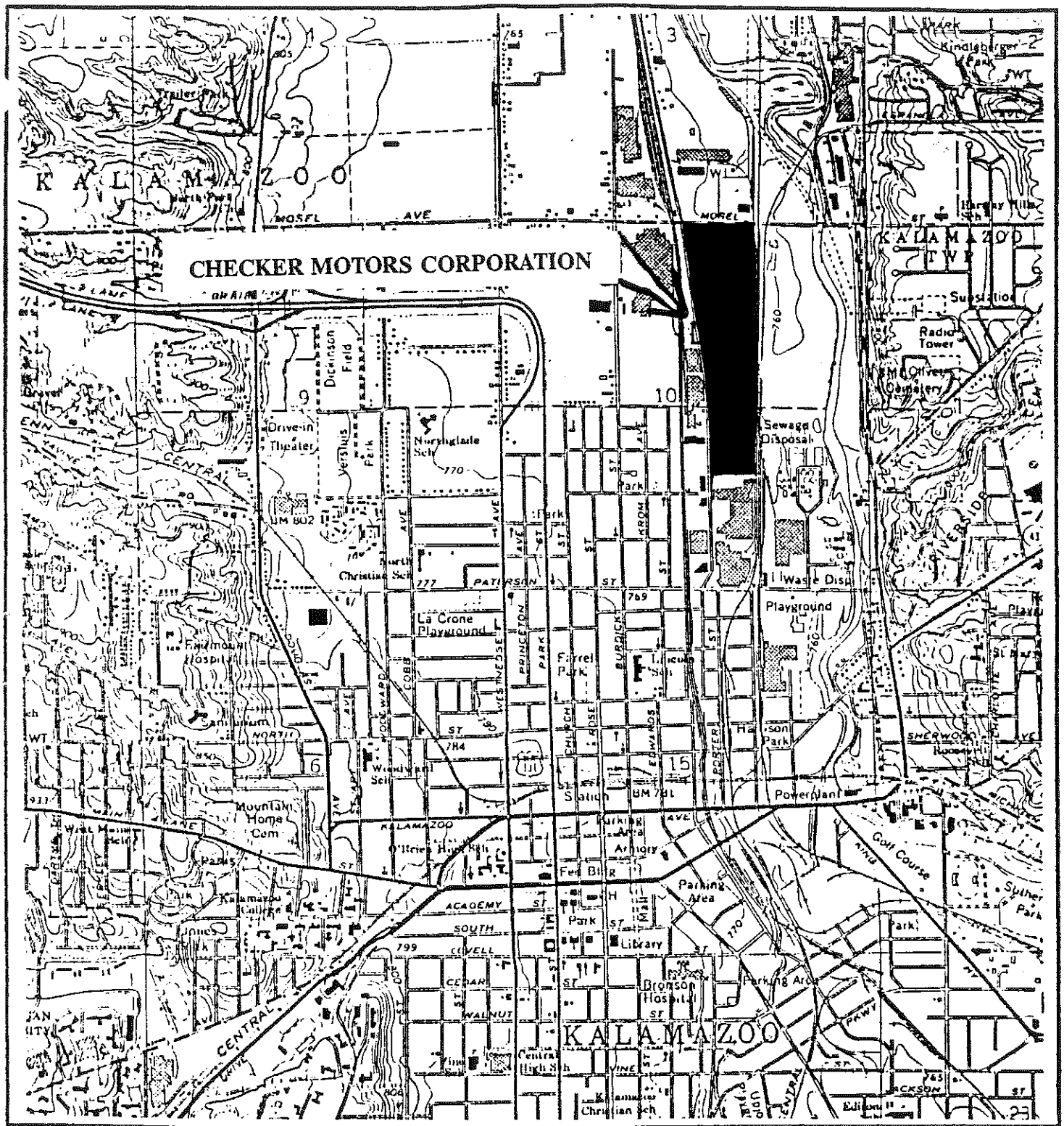
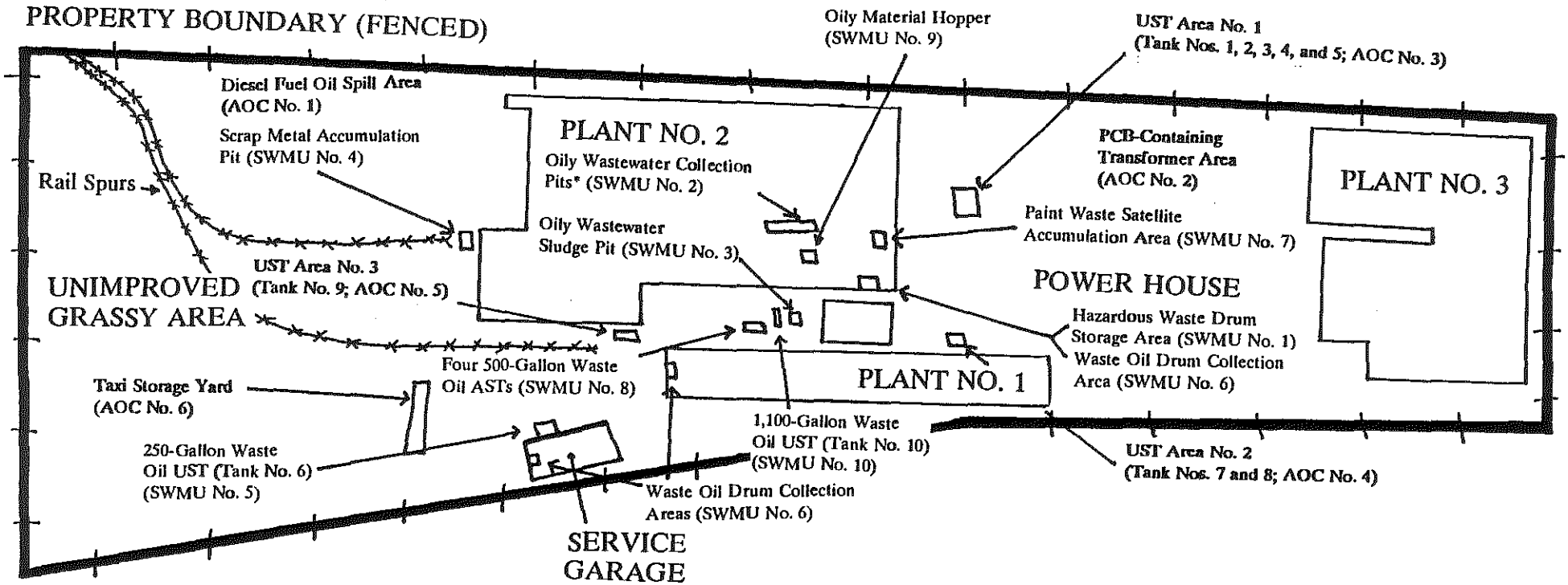


FIGURE 1

FACILITY LOCATION

CHECKER MOTORS CORPORATION



* There are approximately 30 oily wastewater collection pits located throughout Plant No. 2. These pits are located beneath the floor. Existing maps did not indicate the location of each pit. The location of the pit shown in Photo No. 10 in Attachment A is indicated here.

N

Not To Scale

Source: Wilkins, Date Unknown

FIGURE 2

CHECKER FACILITY LAYOUT (Including Location of all SWMUs and AOCs)

In the mid-1960s, Checker began contract part supply work in addition to automobile manufacturing. These manufacturing processes continued until 1982, when the facility ceased automobile manufacturing processes, and went into contract part supply work exclusively. The facility has continued the exclusive production of exterior metal parts under contract since that time (Checker, 1991b).

The current production of exterior metal parts at the Checker facility entails pressing/stamping of sheet metal to form the desired shape and some assembly of parts to complete the product. This assembly includes the use of an adhesive and a compound called sound deadener (Checker, 1991b). These processes are described in detail in Section 2.3.

The current wastes generated as a direct result of the manufacturing processes at the Checker facility are scrap metal, non-contact cooling water, oily wastewater, drum bottoms and the plastic liners from these drums, and oily solid waste. Other wastes generated at the facility are waste oil from machinery use and facility maintenance, and painting wastes (sludge and thinner) from facility maintenance. Sludge is generated from a sludge pit that receives oily wastewater that is generated during pressing/stamping operations (Checker, 1991b). Plating wastewater and waste paint filters were also generated at the facility prior to 1982.

A description of the SWMUs identified during the PA/VSI is provided in Table 1. Figure 2 illustrates the Checker property layout and shows the location and number of all SWMUs and AOCs.

TABLE 1
SOLID WASTE MANAGEMENT UNITS

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
SWMU No. 1	Hazardous Waste Drum Storage Area	No	Active for <90 day storage
SWMU No. 2	Oily Wastewater Collection Pits	No	Active
SWMU No. 3	Oily Wastewater Sludge Pit	No	Active
SWMU No. 4	Scrap Metal Accumulation Pit	No	Active
SWMU No. 5	250-Gallon Waste Oil Underground Storage Tank (UST)	No	Inactive
SWMU No. 6	Waste Oil Drum Collection Areas***	No	Active
SWMU No. 7	Paint Waste Satellite Accumulation Area	Yes	RCRA Closed 1982**
SWMU No. 8	Four 500-Gallon Waste Oil Aboveground Storage Tanks (AST)	No	Active
SWMU No. 9	Oily Material Hopper	No	Active
SWMU No. 10	1,100-Gallon Waste Oil UST	No	Active

* A RCRA hazardous waste management unit is one that currently requires or formerly required a RCRA Part A or Part B permit.

** This area was used as a hazardous waste management unit prior to the date on which the facility requested that its Part A permit application be withdrawn (1982). It is currently used to store paint waste (D001/F003) for <90 days.

*** There are three waste oil drum collection areas; all are used for the collection of waste oil from facility maintenance.

2.3 WASTE GENERATING PROCESSES

The facility currently generates oily wastewater, non-contact cooling water, scrap metal, and oily solid waste from pressing/stamping lines; ignitable drum bottoms from drums of sound deadener that contain mineral spirits (D001) and from drums of adhesive (D001; specific ingredients not available); and solvent-based paint waste containing acetone (D001/F003) and waste oil from facility maintenance. In addition, the facility also generated non-routine wastes, including PCB-contaminated material from removal of PCB-transformers, and oil sludge generated at a sludge pit (Checker, 1991b). Solid wastes generated at the facility are summarized in Table 2, Solid Wastes.

The pressing/stamping lines use lubricating oil while stamping and pressing sheet metal into required shapes. Prior to assembly, the residual oil on the stamped pieces is removed under a water wash. The oily wastewater is contained in collection pits under the pressing/stamping lines (SWMU No. 2) prior to being discharged to the sludge pit (SWMU No. 3). The facility generates approximately 50,000 gallons of oily wastewater per year. Floating oil in SWMU No. 3 is skimmed off the top and collected in an 1,100-gallon waste oil UST (SWMU No. 10) and the remaining wastewater is discharged to the KWRP. The accumulated sludge collected in SWMU No. 3 has not been removed since the installation of the pit in 1972 (Checker, 1991b).

Miscellaneous solid waste, such as rags, absorbent, and oil-containing refuse used in the area of the pressing/stamping lines, is collected in a one cubic-yard oily material hopper (SWMU No. 9). This waste is transported off-site to a municipal landfill (Checker, 1991b).

The majority of the scrap metal generated from the pressing/stamping lines is collected on an under-floor conveyor system and transported to a scrap metal accumulation pit (SWMU No. 4). Miscellaneous scrap metal from this process is also collected in one cubic-yard hoppers, which are subsequently dumped at the scrap metal accumulation pit. The scrap metal, which is oil-free, is generally emptied from the pit twice daily (Checker, 1991b).

Non-contact cooling wastewater used during the pressing/stamping process is discharged directly to the Kalamazoo River (approximately 200,000 gallons per day) under National Pollutant Discharge Elimination System (NPDES) Permit No. MI-000581-9 (Checker, 1991b).

During assembly, the facility uses sound deadener and adhesives. Each product comes in a 55-gallon drum which has a plastic liner. The bulk of the material is used during assembly. Drum bottoms, which are scraped out of the plastic liners and are considered hazardous due to their ignitable characteristic, are stored at a hazardous waste drum storage area (SWMU No. 1) for less than 90 days prior to shipment off-site for disposal. The empty plastic liners are collected and shipped off-site for disposal as a nonhazardous waste. Empty drums are shipped off-site for recycling. The facility annually generates approximately 25 drums of waste from the sound deadener drum bottoms, and 5 to 6 drums of waste from the adhesive drum bottoms (Checker, 1991b).

TABLE 2
SOLID WASTES
CHECKER MOTORS CORPORATION FACILITY

Solid Waste	Source	SWMU No.
Drum Bottoms (D001)	Stamping/Pressing Operations; Assembly	1
Scrap Metal	Stamping/Pressing Operations	4
Oily Wastewater	Stamping/Pressing Operations	2, 3
Non-Contact Cooling Water	Stamping/Pressing Operations; Assembly	Discharged via Facility Outfalls to Kalamazoo River
Oily Solid Waste	Stamping/Pressing Operations	9
Sludge	Oily Wastewater Sludge Pit	3*
Waste Oil	Facility Maintenance Sludge Pit	6, 8, 10
Polychlorinated Biphenyl (PCB) Containing Waste	Facility Maintenance	One time generation; waste was disposed of at a licensed landfill
Painting Wastes (D001/F003)	Facility Maintenance	7
Plating Wastewater	Plating Operations	2
Paint Filters	Paint Booths	**

* The sludge in the Oily Wastewater Sludge Pit has not been disposed of since operations began.

** There is no information available that describes how this waste was handled or whether it was handled as hazardous or nonhazardous waste.

Waste oil generated during maintenance of facility machinery and vehicles is collected in one of three waste oil drum collection areas (SWMU No. 6). When a machine breaks down, the large volume of waste oil generated is collected in one of four portable 500-gallon waste oil ASTs (SWMU No. 8). The waste oil is tested for chlorinated solvents prior to being taken off-site for recycling. Approximately 5,000 gallons of waste oil is generated from facility maintenance per year (Checker, 1991b).

Solvent-based paint waste containing acetone (D001/F003) is generated during cleaning of painting equipment. Approximately one drum of this waste is collected annually in a 55-gallon satellite accumulation drum located in a second floor room in the southwest corner of Plant No. 2 (SWMU No. 7) (Checker, 1991b).

During removal of PCB-transformers in the late 1980s, Checker generated PCB-containing wastes. This is a non-routine waste (Checker, 1991b).

Prior to ceasing production of automobiles in 1982, the facility also generated plating wastes from nickel, chromium, zinc, cadmium, and copper plating lines. Mr. Dick Rumbaugh of Checker stated that the facility collected spent plating baths in a collection pit and pH-neutralized them prior to their discharge to the KWRP. This collection pit is currently being used as an oily wastewater collection pit in association with the pressing/stamping lines (SWMU No. 2) (Checker, 1991b). No file information was available describing the volume of plating wastewater that was generated at the facility or verifying that the plating wastewater was considered a nonhazardous waste.

Until 1982, Checker also generated waste paint filters used to collect overspray from automobile paint lines. The facility's Part A permit application identified Checker as generating "paint residuals" (F017), but did not clarify whether this included these paint filters. No file information was available describing whether the paint filters were considered hazardous waste, the volume generated, or the method or frequency of disposal. Mr. Rumbaugh stated that he could not find any records documenting that the waste paint filters were disposed of as hazardous waste.

2.4 RELEASE HISTORY

The Checker facility experienced several releases of contaminants into the environment including a surface water release and releases to the soil associated with removal of USTs, a ruptured fuel tank, and a leaking PCB-transformer. These events are further described below.

Release to Surface Water

The Surface Water Quality Division (SWQD) of MDNR received an anonymous complaint from a Checker employee regarding the discharge of a pressing/stamping process collection pit filled with oily wastewater directly to the Kalamazoo River on January 29, 1986. The caller stated that a foreman had ordered the discharge and that this type of incident had occurred three times previously. The followup Activity Report concerning the allegations indicated that MDNR officials had observed oil on the Kalamazoo River at the Mosel Street bridge, just east of the northeast corner of the Checker facility (MDNR, 1986a).

As a result of this activity, MDNR issued a Notice of Noncompliance to the facility in May 1986. A criminal complaint was not filed because the facility had not been previously notified that the activity was a violation (MDNR, 1986d). There is no additional file information that indicates the final resolution of this incident. Checker has not released oily wastewater to the Kalamazoo River since this incident (Checker, 1991b).

Diesel Fuel Oil Spill

In March 1986, a Grand Trunk and Western train derailed at the facility, rupturing a diesel fuel oil tank and spilling approximately 300 gallons of diesel fuel oil onto the ground in the Diesel Fuel Oil Spill Area (AOC No. 1; Photo not available). Clean-up crews excavated and removed soil contaminated by the spill. No information is available regarding the methods used to determine the extent of soil contamination or whether or not any groundwater sampling was performed. The contaminated soils were disposed at Westside Landfill in Three Rivers, Michigan. Checker notified MDNR of the spill. However, file information does not indicate whether MDNR observed and/or approved of the clean-up activities. As an effort to prevent reoccurrence of such an event, Checker proposed to improve the condition of the tracks leading into their plant from the Conrail railway line along the eastern border of the facility (See Figure 2) (Checker, 1986). There is no information available as to whether or not the proposed actions were enacted.

PCB Leak

On December 4, 1986, Checker notified MDNR that a PCB-containing transformer at the facility had leaked, releasing an undetermined volume of oil to the surrounding PCB-Containing Transformer Area (AOC No. 2; See Photo No. 17). No information regarding the size of the transformer was available at the time of the VSI. Soil samples from the area of AOC No. 2 indicated the presence of PCBs (Arochlor 1260) in the soils at levels up to 13 milligrams/kilogram. The MDNR Complaint/Response Form indicated that Checker proposed to remove all contaminated soils, dispose of them properly, and come into compliance with PCB regulations. File information does not indicate whether the proposed actions were carried out. However, during the VSI Mr. Rumbaugh stated that MDNR did supervise and approve of the cleanup activities and the associated removal of all PCB-containing transformers. He also stated that the facility is no longer required to submit annual records of PCBs to MDNR (MDNR, 1986c; Checker, 1991b).

Local Groundwater Contamination

Mr. Rumbaugh indicated that MDNR is currently investigating a local total petroleum hydrocarbon (TPH) groundwater contamination problem. The area under investigation includes the Checker facility as well as the upgradient industrial area. No additional information describing this investigation was available during the PA/VSI.

No information reviewed during the PA/VSI indicates whether this local groundwater contamination problem has been caused by releases from the Checker facility. According to Mr. Rumbaugh, MDNR is currently conducting an investigation to determine the source or sources. Mr. Rumbaugh added that MDNR is withholding approval of all Checker's UST removals pending completion of the investigation. The local TPH groundwater contamination problem is discussed here to provide context for the pending status of approval for Checker's UST removals.

Underground Storage Tank Removals

Checker removed contaminated soils found during UST removals in 1989 and 1990. Checker also removed five USTs in 1982; there is no documentation of contaminated soil in association with those USTs. MDNR approval of any UST removal at the Checker facility is pending completion of MDNR investigation of the aforementioned local TPH groundwater contamination problem (Checker, 1991b). The removal activities related to the UST removals in 1982, 1989, and 1990 are described in detail below.

In 1982, Checker removed one steel and two fiberglass gasoline USTs (Tanks Nos. 1, 2, and 3; capacity unknown) along with two steel lacquer-based thinner USTs (Tank Nos. 4 and 5; capacity unknown) under MDNR observation. These USTs were located in UST Area No. 1, immediately south of Plant No. 2 (AOC No. 3; See Figure No. 2 and Photo No. 1) (Checker, 1991b). EPA and MDNR files did not provide any information regarding this

removal action. According to Mr. Rumbaugh, there was no contaminated soil removed in association with these USTs (Checker, 1991b).

In 1989, Checker removed one 250-gallon waste oil UST (Tank No. 6) located immediately east of the Service Garage (SWMU No. 5; See Figure No. 2 and Photo No. 4) (BEI, 1990). EPA and MDNR files did not provide any information regarding this removal. During the VSI, Mr. Rumbaugh speculated that this tank was probably installed during construction of the Service Garage in 1928. According to Mr. Rumbaugh, Checker excavated and removed soil to the ground water (approximately 10 feet below ground surface) under MDNR oversight (Checker, 1991b).

In November 1990, Checker removed one 5,000-gallon steel UST that contained a wax product (Tank No. 7) and one 1,000-gallon steel mineral spirit UST (Tank No. 8) from UST Area No. 2 under MDNR observation (AOC No. 4; See Figure 2 and Photo No. 2) (BEI, 1991a; Checker, 1991b). Both tanks were installed in the mid-1970s.

According to a January 10, 1991, report by a consultant to Checker documenting the removal of Tank Nos. 7 and 8, five soil samples collected from the area beneath the two tanks and from the wall of the excavation contained significant quantities of total petroleum hydrocarbons (TPH) (up to 4,300 parts per million (ppm)). Other contaminants detected in soil samples included benzene, toluene, ethyl benzene, and/or xylene (BTEX) compounds and polynuclear aromatic hydrocarbons (PAH). A groundwater sample from the area contained 94 ppm TPH, but BTEX and PAHs were not detected. The report speculated that there may be two sources for the TPH contamination, the mineral spirits in Tank No. 8 and from a regional problem with TPH in the groundwater (BEI, 1991a). According to Mr. Rumbaugh, MDNR observed Checker's contractor remove approximately 300 cubic yards of soil in the area of the UST excavation (Checker, 1991b); no information describing how the contractor determined the extent of contamination is available. Subsequent to the soil removal, the contractor backfilled the excavation with sand and gravel.

In December 1990, Checker removed one 6,000-gallon leaded fuel UST (Tank No. 9) from UST Area No. 3, located immediately west of Plant No. 2 (AOC No. 5; See Figure 2 and Photo No. 3). A January 31, 1991, report generated for Checker documenting this removal states that at least twelve perforations were found along the bottom of the UST. Soil samples collected in the area of the UST indicated the presence of BTEX compounds as well as up to 11 ppm total lead. Groundwater samples from the area indicate the presence of both BTEX compounds and lead (BEI, 1991b). No other information regarding remediation activities at this UST was available in the report. According to Mr. Rumbaugh, MDNR observed the excavation of approximately 100 cubic yards of soil in the area of the UST (Checker, 1991b).

2.5 REGULATORY HISTORY

RCRA

In September 1980, Checker submitted a Notification of Hazardous Waste Activity (Notification) to the U.S. EPA identifying the facility as a generator and storage facility (Checker, 1980a). File information about the Notification is incomplete and as a result the wastes listed in the Notification are not available. In December 1980, Checker submitted a Part A permit application (Part A) identifying only paint residual (F017) waste (Checker, 1980b). The facility designated the Paint Waste Satellite Accumulation Area (SWMU No. 7) as the hazardous waste storage unit (Checker, 1991b). The Part A estimated the annual volume of this waste stored in 55-gallon drums at the facility as 3,100 pounds (Checker, 1980b).

As of 1982, the paint residue was no longer a RCRA regulated waste, thus the facility requested to withdraw its Part A. The U.S. EPA agreed that the facility was no longer required to have a hazardous waste permit under RCRA. Since the facility had stored hazardous waste after November 19, 1980, U.S. EPA required the facility to submit a closure plan (U.S. EPA, 1983). Checker submitted a closure plan in August 1983 (Checker, 1983). There is no information documenting that the U.S. EPA or MDNR conducted a closure inspection of the facility. However, in a July 1985 letter, MDNR stated it considered the Checker facility to be a small quantity generator (MDNR, 1985b).

Between 1981 and 1989, MDNR conducted numerous RCRA compliance inspections of the Checker facility. During a September 1981 inspection, MDNR noted that the facility was a generator of unspecified paint waste. No violations were cited as a result of this inspection (MDNR, 1981).

MDNR cited the following violations based on a March 1983 inspection (MDNR, 1983):

- the drums stored on-site were not clearly labeled with the date upon which the accumulation period began or with the words "Hazardous Waste,"
- personnel records were incomplete,
- the contingency plan was incomplete, and
- the hazardous waste storage area did not have the required secondary containment.

There is no file information that indicates whether or not the facility corrected the violations.

In March 1985, an MDNR inspector noted that greater than 1,000 kilograms of waste sludge from plating operations remained at the facility and should be characterized as an F006 waste (MDNR, 1985a). No documentation describing how or when this waste was shipped off-site for disposal was available during the PA/VSI. However, a July 1985 letter from Checker to MDNR states that Checker had achieved small quantity generator status (Checker, 1985). A subsequent letter from MDNR to Checker confirms that the facility qualified for small quantity generator status at that time (MDNR, 1985b).

In a February 1989 inspection of the Checker facility, MDNR noted the following violations (MDNR, 1989a):

- the facility did not inspect the containers of hazardous waste for leaks and defects on a weekly basis,
- that the facility had not provided adequate secondary containment for all of the liquid hazardous waste on-site,
- that personnel training records were incomplete, and
- the spill plan must be amended/expanded to include the required information.

Subsequent letters from the MDNR to Checker dated October 10, 1989, and January 2, 1990, stated that the facility still had not produced documentation showing that all violations cited during the 1989 inspection had been corrected (MDNR, 1989c; MDNR, 1990a). At the time of the VSI, Mr. Rumbaugh stated that all the necessary corrections have been made and documentation has been submitted to the MDNR (Checker, 1991a, 1991b; DeLisle, 1990). He added that the facility has not received any written confirmation from the MDNR whether the corrections are acceptable or not.

The Checker facility currently has two regulated areas for the accumulation and/or storage of hazardous wastes for less than 90 days. The Hazardous Waste Drum Storage Area (SWMU No. 1) manages sound deadener drum bottoms (25 to 30 drums per year; D001) and adhesive drum bottoms (5 to 6 drums per year; D001). The Paint Waste Satellite Accumulation Area (SWMU No. 7) is used to accumulate waste paint solvent (1 drum per year; D001/F003) (Checker, 1991b).

Clean Water Act

Prior to 1975, the Michigan Water Resource Commission (WRC) issued NPDES Permit No. MI-000581-9 to the Checker facility (MDNR, 1976). Under this permit, Checker discharged both contact and non-contact wastewater to the Kalamazoo River (Checker, 1991b). The permit required Checker to complete construction of waste control facilities by December 31, 1975. In response to a December 1975 request by Checker, WRC extended the deadline to April 30, 1976 (MDNR, 1975). In May 1976, WRC conducted an inspection at the Checker facility and analyzed the wastewater discharge. The analysis showed the following results (MDNR, 1976):

Total Suspended Solids	20 mg/l
Hexavalent Chrome	<10 ug/l
Total Chrome	10 ug/l
Nickel	<50 ug/l
Cadmium	<10 ug/l
Cyanide	<.01 mg/l
Total Phosphorous	.86 mg/l

The July 1976 MDNR letter reporting the sample results indicated that WRC was processing a revised NPDES Permit reflecting that Checker had changed its operations and was currently discharging only non-contact cooling water (MDNR, 1976).

Checker applied for a reissuance of its NPDES permit in January 1981, requesting a change in permit limitations that would allow an increase in the amount of non-contact cooling water discharged from the facility. The reason given for the increase in discharge from the facility was that Checker had purchased an adjoining facility (Plant No. 3) and thus an additional outfall (Checker, 1981). MDNR approved the change and reissued the permit, allowing 458,000 gallons per day (gpd) from the existing outfall (001), which handles wastewater from Plant No. 2, and 500,000 gpd from the new outfall (002). Outfall 002 carries non-contact cooling water from Plant No. 3. MDNR also stated that at that time, the Checker facility was meeting the existing permit conditions (MDNR, 1982).

A Verbal Communication Report filed by MDNR on February 24, 1986, indicated that the Checker facility was in violation of its NPDES permit from December 19 to 31, 1985, because the facility had not reported the pH, temperature, nor observations of the outfalls. A representative of MDNR contacted Richard Rumbaugh of Checker to inform him of the problem. Mr. Rumbaugh agreed to provide a written report by March 3, 1986, and to have someone check the outfall seven days per week instead of only five days per week. Mr. Rumbaugh also stated that the facility had been shut down during the period of violation (MDNR, 1986b).

No further documentation of any violations of the Clean Water Act was present in the available files. MDNR issued the Checker facility a renewed NPDES permit on December 13, 1990, which is not scheduled to expire until 1995. This permit allows the facility to discharge up to 1,200,000 gpd of non-contact cooling water and unlimited storm water to the Kalamazoo River (MDNR, 1990c).

Currently, all contact wastewater at the Checker facility flows through the Oily Wastewater Sludge Pit (SWMU No. 3) prior to discharge to the KWRP. There are separate sanitary system discharges to the city sewer system for treatment at the KWRP (Checker, 1991b).

Clean Air Act

The Checker facility maintains air permit Nos. 165-84 and 502-83 for a sound deadener application fixture with an exhaust hood and a sound deadener spray booth, respectively, and permit No. 108-86 to operate two boilers. An August 1987 MDNR inspection of the Checker facility indicated that the facility was not in compliance with their air permit No. 502-83. The volatile organic compound (VOC) emissions from a sound deadener spray booth were slightly exceeding the permit limitations. MDNR noted in the Activity Report of the inspection that the facility had grossly overestimated the VOC emissions from another sound deadener spray booth. MDNR suggested that the facility should amend the estimated emission limits to more accurately reflect the actual production (MDNR, 1987b).

During the same inspection MDNR also noted that a mistake had been made in the evaluation of two boilers at the facility. The boilers were designated as 2 Million British Thermal Units (MMBTU) whereas they are actually greater than 20 MMBTUs. This realization had an effect on the amount of oil that was allowed to be used in association with the boilers. Further investigation revealed that the facility was no longer using oil and was instead burning natural gas. A February 1988 Permit Activity Report indicates that permit No. 108-86 for the boilers was to be revised to reflect the change (MDNR, 1988).

MDNR inspections on March 9, 1989, and March 8, 1990, found the facility was in compliance with the Michigan Air Pollution Control Commission Rules and with all applicable air permits (MDNR, 1989b; MDNR, 1990b).

Underground Storage Tanks

The Checker facility has used five areas at the facility for the installation of USTs. The locations of past and present USTs at the facility are shown in Figure 2. Most of the USTs were used to store products, such as leaded and unleaded fuels, wax, mineral spirits, and paint thinners. Two USTs were used to store waste oil. The only UST that has not been removed to date is the 1,100-gallon capacity UST (Tank No. 10; SWMU No. 10) used in association with the Oily Wastewater Sludge Pit (SWMU No. 3). This UST is scheduled to be removed in 1991.

In 1982, Checker removed one steel and two fiberglass gasoline USTs (Tanks Nos. 1, 2, and 3; capacity unknown) along with two steel lacquer-based thinner USTs (Tank Nos. 4 and 5; capacity unknown) under MDNR observation. These USTs were located in UST Area No. 3, immediately south of Plant No. 2 (AOC No. 5; See Figure No. 2 and Photo No. 1) (Checker, 1991b). EPA and MDNR files did not provide any information regarding this removal action. According to Mr. Rumbaugh, there was no contaminated soil removed in association with these USTs (Checker, 1991b).

The remaining USTs that were used in the past have also been removed under MDNR observation (Checker, 1991b). The UST removal efforts are described in detail in Section 2.4, Release History. A letter from MDNR to the facility dated July 11, 1991, indicates that the facility is not in compliance with the record keeping and reporting requirements with respect to UST removals and that the facility has failed to conduct investigations and submit results in accordance with the schedule established in the approved work plan (MDNR, 1991). Checker is currently undergoing further discussions with MDNR regarding excavation requirements and responsibility (Checker, 1991b). MDNR approval of any of the above mentioned UST removals is pending completion of the MDNR investigation of the local TPH groundwater contamination problem.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and groundwater in the vicinity of the Checker facility.

2.6.1 Climate

Climatic data was not available for Kalamazoo. Data for Grand Rapids, Michigan, located approximately 45 miles north of Kalamazoo, was obtained and is summarized below. The Kalamazoo area can be expected to have slightly higher temperatures and precipitation than Grand Rapids, but the locales are otherwise similar.

The greater Grand Rapids area has a continental climate characterized by a wide range of temperatures between summer and winter, though the climate is moderated by proximity to Lake Michigan, located 30 miles to the west (NOAA, 1990). Average wind speed and direction is southwest at 10 miles per hour. Precipitation is moderate and occurs mostly in spring through the autumn, with little in the winter. Grand Rapids' climate is influenced by westerly storms. The Gulf of Mexico is the major source of moisture for precipitation for the area. Mean annual precipitation is 34 inches and evapotranspiration is approximately 31 inches (NOAA, 1979); net annual precipitation is approximately 3 inches. The greatest 24-hour rainfall on record was 5.48 inches in 1981 (NOAA, 1990).

High temperatures in the summer rarely exceed 90 degrees Fahrenheit (F). Low temperatures in the winter are zero degrees F or higher. The average annual temperature in 1990 was 49.4 degrees F, and ranged from an average 70.3 degrees F in July to 28.1 degrees F in January (NOAA, 1990).

2.6.2 Flood Plain and Surface Water

The Checker facility is located approximately 1,200 feet west of the Kalamazoo River in the city of Kalamazoo. Surface water run-off from the facility is east towards the Kalamazoo River. The facility is not located within the 100-year flood plain of the Kalamazoo River (FEMA, 1985). The Kalamazoo River flows north in the vicinity of the facility, and eventually turns west to discharge into Lake Michigan.

2.6.3 Geology and Soil

The Checker facility is located in the Kalamazoo valley, which was formerly a large glacial meltwater drainageway cut into an extensive outwash plain which covers the majority of Kalamazoo County. In consequence, the surficial geological materials are largely sands and gravels deposited by glacial meltwater streams and the Kalamazoo River. The surficial soils identified during UST investigations at the facility were dark loamy sand with gravelly coarse sand in the subsurface (BEI, 1991a). The total thickness of the unconsolidated deposits is approximately 100 to 150 feet (WMU, 1981).

The Checker facility and most of Kalamazoo County are underlain by Mississippian age Coldwater shale bedrock (MDNR, 1987). The Coldwater shale is an extensive formation that is as much as 1,300 feet thick in some areas (MDNR, 1964). There was no site-specific geology or soil characterization available at the time of the PA/VSI.

2.6.4 Groundwater

Six monitoring wells, installed on-site during UST investigations in the approximate area of the Service Garage, reveal that groundwater is encountered at as little as 5.5 feet below ground surface (BGS) in some locations, but as much as 10 feet BGS near the UST areas (BEI, 1991b). The groundwater flow direction is to the east towards the Kalamazoo River, which controls small fluctuations in groundwater elevations because of its proximity to the facility (BEI, 1991a). Information describing the condition of the monitoring wells was not available. Dynamac notes that MDNR approval of the UST closures at the Checker facility is pending an investigation of a local TPH groundwater problem which extends up-gradient and cross-gradient to the facility.

The principal source of groundwater in the area is glacial outwash aquifers. The Coldwater shale is not utilized as an aquifer in this area (Verburg, 1991).

2.7 RECEPTORS

The Checker facility is located in the City of Kalamazoo, Michigan, which has a metropolitan population of approximately 90,000 persons. Downtown Kalamazoo is located approximately one mile south-southwest of the facility.

The Checker facility is located in an industrial area, with some private residences located approximately one-half mile east of the facility. The entire facility property is enclosed with a six-foot chain-link fence and there is twenty-four-hour security, seven days per week (See Figure 1) (Checker, 1991b).

Potential receptors of an air or soil release at the Checker facility include the individuals currently employed at the Checker facility (approximately 350 persons). The possibility of public contact with air contaminants is limited because the quantities of volatile hazardous substances at the facility are small and would dissipate rapidly in the outside air. Likewise, the possibility of public contact with contaminated soils at the facility is limited because the property is fenced and there is 24-hour security.

Persons in the area of Kalamazoo obtain drinking water from several municipal groundwater wells. Ingestion of drinking water contaminated by the Checker facility is unlikely because the nearest downgradient drinking water wells are located approximately 4.5 miles from the Checker facility (Checker, 1991b). The nearest cross-gradient wells are located approximately one mile from the facility and are potential receptors of the local TPH groundwater contamination (See Section 2.3, Release History).

The nearest surface water body is the Kalamazoo River, located approximately 1,200 feet east of the facility. The river is used for fishing and recreational activities. Persons using the River for such activities are the potential receptors of a surface water release from the facility. Potential contamination of surface water in the future is controlled via discharges regulated by an NPDES permit. Although there is documentation of a release to the Kalamazoo River in 1986, there is no record of NPDES violations since that time.

There are no sensitive environments located in the vicinity of the Checker facility. There are sensitive populations located within a two-mile radius, namely Borgess Hospital.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the SWMUs identified during the PA/VSI. The following information is presented for each SWMU; description of the unit, dates of operation, wastes managed, release controls, history of release, and Dynamac's observations.

SWMU No. 1 **Hazardous Waste Drum Storage Area**

Unit Description: The Hazardous Waste Drum Storage Area is a 30-foot by 20-foot (approximate) concrete-floored area located in the southwest corner on the first floor of Plant No. 2. Waste is stored in 55-gallon drums. On average, four to six drums containing waste liners and/or drum bottoms from the sound deadener and adhesive are stored at this SWMU for less than 90 days.

Date of Startup: This SWMU was first used as a storage area for hazardous waste when sound deadener and adhesive were first used at the facility in the mid-1980s. Prior to that time, this area was used for drum storage of waste oils. The first date that this area was used to manage nonhazardous waste oil is unknown.

Date of Closure: This SWMU is currently active for storage of waste oil and hazardous wastes for less than 90 days and was never permitted as a RCRA hazardous waste management storage unit.

Wastes Managed: This SWMU manages nonhazardous waste oil, hazardous drum bottoms collected from drums containing sound deadener and adhesives, as well as nonhazardous, cleaned plastic drum liners from sound deadener and adhesive product drums. Although no Material Safety Data Sheets (MSDS) or waste analysis were available for the adhesive, Mr. Rumbaugh stated that analysis of the adhesive indicated that the waste has ignitable characteristics (D001). The sound deadener contains mineral spirits and is also identified by Checker as a D001 waste. Analysis of cleaned plastic liners shows that they do not exhibit the ignitable characteristic.

Release Controls: This SWMU is located inside Plant No. 2 on a concrete floor in good condition. Hazardous wastes are kept in drums and are primarily solid or sludge-like in composition, thereby limiting the potential for runoff. The area is well marked and restricted to authorized personnel. An absorbent pad is situated underneath the hazardous waste collection drum and is periodically changed and disposed of as a hazardous waste.

History of Releases: No releases have been documented. However, a potential current release is described in Observations, below.

Observations: The drums containing hazardous waste that were stored in this SWMU appeared to be in good condition.

The floor in the area of this SWMU was heavily stained with a black, grease-like substance (See Photo Nos. 5 and 7). Without sampling this substance, Dynamac could not determine if the substance was nonhazardous waste oil or if it was residual sound deadener from the weekly cleaning of dirty plastic liners.

Dynamac observed one closed drum full of D001 drum bottoms (See Photo No. 5), one open drum of waste product with the liner intact (See Photo Nos. 5 and 6), and one drum used to collect dirty liners prior to cleaning (See Photo No.7). Mr. Rumbaugh explained that when a sound deadener or adhesive product drum is used, the drum, still containing the plastic liner and drum bottoms, is brought to this SWMU. The dirty liner is removed and placed in a dirty liner collection drum (See Photo No. 7). About once per week, a Checker employee scrapes the residual substance from the collected dirty liners. The residual material is placed in the hazardous waste drum (See Photo No. 5). The "cleaned" liners, which, according to Mr. Rumbaugh, no longer exhibit hazardous characteristics, are placed in a separate drum and eventually disposed of off-site at a municipal landfill.

Dynamac notes that Checker does not identify the drum in which dirty liners are collected as containing hazardous waste and that this drum is left open (See Photo No. 7).

Several drums containing nonhazardous hydraulic and waste oils were also located in this SWMU at the time of the VSI.

There were several signs indicating this area is used to store hazardous waste. There were also signs prohibiting smoking and restricting the area to authorized personnel.

SWMU No. 2 **Oily Wastewater Collection Pits**

Unit Description: A concrete collection pit is situated underneath each pressing/stamping machine. Because these pits are located underneath extremely heavy machinery, they could not be observed during the VSI. Mr. Rumbaugh could not provide specific details regarding the exact size of each pit. However, he did note that some pits serve more than one machine. Photo No. 10 shows one of approximately forty pressing/stamping machines located throughout the facility. The representative machine shown in Photo No. 10 covers a floor area of approximately 30 feet by 30 feet, underneath which is one of approximately thirty oily wastewater collection pits.

Date of Startup: The date of startup for this SWMU is unknown.

Date of Closure: This SWMU is currently active for the collection of oily wastewater.

Wastes Managed: Prior to 1982, one of these pits was used to collect plating wastewater from the plating line used in association with automobile manufacturing. This SWMU currently manages nonhazardous oily wastewater only.

Release Controls: Each pit is constructed of concrete with one discharge to the oily wastewater sludge pit (SWMU No. 3)

History of Releases: In 1986, MDNR received an anonymous complaint from a Checker employee alleging that one of the oily wastewater collection pits filled with oily wastewater was discharged directly to the Kalamazoo River. The caller stated that a foreman had ordered the discharge, and that this type of incident had occurred three times previously (MDNR, 1986a). As a result of this activity, the MDNR issued a Notice of Noncompliance to the facility in May 1986.

No other releases, other than regular discharge to SWMU No. 3, have been documented.

Observations: Because these oily wastewater collection pits were located underneath extremely heavy machinery, Dynamac could not obtain access to make observations during the VSI.

SWMU No. 3 **Oily Wastewater Sludge Pit**

Unit Description: The Oily Wastewater Sludge Pit is approximately 15 square feet in area and 12 feet deep. It is constructed of approximately 12-inch concrete walls and floor. A 14-foot center wall gives the appearance of two sludge pits (See Photo No. 11). This SWMU is located just outside the south side of Plant No. 2 (See Figure 2). The pit is equipped with an oil skimmer to remove floating oil from the wastewater. The oil is pumped to an adjacent 1,100-gallon waste oil UST (SWMU No. 10; See Photo No. 12). Wastewater is subsequently discharged to the KWRP. According to Mr. Rumbaugh, sludges have been collecting in the bottom of the pit since its installation in 1972.

Date of Startup: This SWMU was installed around 1972.

Date of Closure: This SWMU is still active.

Wastes Managed: This SWMU manages oily wastewater that is generated during the pressing/stamping operations at the facility.

Release Controls: This SWMU has 12-inch thick concrete walls and floor. There are steel plates on the ground in the area of this SWMU. However, the plates are not completely interconnected; thus any spilled material could seep into the soil between the plates.

History of Releases: No releases have been previously documented (See Observations).

Observations: This SWMU appeared to be in good condition; the visible portions of the walls were intact and there were no apparent cracks. There was a 3-foot guard rail painted bright yellow surrounding this SWMU. Most of the ground in this area is covered with steel plates that are stained with oil and contain puddles with oily sheens. The soil between the plates in this area is stained black from oil as well (See Photo No. 12).

SWMU No. 4 **Scrap Metal Accumulation Pit**

Unit Description: The Scrap Metal Accumulation Pit is located outside the north side of Plant No. 2 (See Figure 2). Scrap metal from the pressing/stamping operations is brought to the pit via an under-floor conveyor system and one cubic-yard hoppers. This SWMU is approximately 25 square feet in area and 10 feet deep and has concrete walls and a gravel floor (See Photo No. 13). When the pit is full (generally twice daily), the metal scrap is transferred to rail cars and is taken off-site to be sold for recycling.

Date of Startup: The pit was installed in the 1970s. Scrap metal was collected on the ground at this location as early as the 1920s, prior to the installation of the pit.

Date of Closure: This SWMU is still active.

Wastes Managed: This SWMU manages scrap metal generated during the pressing/stamping operations.

Release Controls: The scrap metal that is collected at this SWMU is oil-free. However, this concrete-walled SWMU is located outdoors and has a gravel floor and no cover. Plant No. 2 walls surround this SWMU on the west and south and the concrete wall of the pit is raised approximately three feet above ground level on the north. The east side is flat at ground level, thus storm run-off could enter the pit.

History of Releases: No releases have been documented.

Observations: This SWMU appeared to be in good operating condition; the visible portions of the walls were intact, although there were numerous chips in them. There was no fencing around the pit area to restrict access to the pit.

SWMU No. 5 **250-Gallon Waste Oil UST**

Unit Description: The 250-Gallon Waste Oil UST was located immediately east of the service garage and northwest of Plant No. 1 (See Figure 2). Checker removed this UST and associated contaminated soil in 1989. The excavated area has been backfilled with sand and gravel (See Photo No. 4).

Date of Startup: According to Checker, this UST was most likely installed concurrent with construction of the Service Garage in the late 1920s.

Date of Closure: This SWMU was removed in 1989.

Wastes Managed: This SWMU formerly managed nonhazardous waste oil generated during facility maintenance.

Release Controls: There is no documentation of release controls associated with this SWMU.

History of Releases: According to Mr. Rumbaugh, Checker excavated and removed soil to the ground water (approximately 10 feet below ground surface) in 1989 under the direction of the MDNR. EPA and MDNR files did not provide any information regarding this removal. Approval of this removal is pending additional MDNR investigation of a local groundwater problem (Checker, 1991b).

Observations: The area (approximately 35 feet by 15 feet) where this SWMU was located is now backfilled with sand and gravel.

SWMU No. 6 **Waste Oil Drum Collection Areas**

Unit Description: Checker collects waste oil from facility maintenance activities at three waste oil drum collection areas. One of these areas is located inside Plant No. 1 at the northern-most end, and consists of one 55-gallon drum set upon some absorbent material (See Figure 2 and Photo No. 8). A second area is located inside the service garage, and consists of four 55-gallon drums set inside fiberglass tubs (See Figure 2 and Photo No. 9). In addition, SWMU No. 1, the hazardous waste drum collection area, is also used to collect drums of nonhazardous waste oil (See Photo No. 7).

Date of Startup: The date of startup for this SWMU is unknown.

Date of Closure: This SWMU is still active.

Wastes Managed: This SWMU manages nonhazardous waste oil generated during facility maintenance.

Release Controls: In one area the waste oil collection drum is set upon some absorbent material. In another area the waste oil collection drums are set inside fiberglass tubs. Release controls at the hazardous waste drum collection area are described in SWMU No. 1. All of the waste oil collection drums are located inside and on concrete floors.

History of Releases: No releases have been documented.

Observations: The Waste Oil Drum Collection Area located inside Plant No. 1 consists of one 55-gallon drum in good condition, situated between two 55-gallon drums containing product. The three drums are set against a concrete wall on absorbent material. The Waste Oil Drum Collection Area located inside the Service Garage consists of four 55-gallon drums in good condition stored inside portable fiberglass tubs. The Waste Oil Drum Collection Area that is associated with SWMU No. 1 consists of three to four 55-gallon drums located on a concrete floor inside Plant No. 2. The floor in this area was heavily stained with a black, grease-like substance (See Photo Nos. 5 and 7). Without sampling this substance, Dynamac could not determine if the substance was nonhazardous waste oil or if it was residual sound deadener from the weekly cleaning of dirty plastic liners (See SWMU No. 1). The drums containing the waste oil were in good condition and were identified as nonhazardous waste.

SWMU No. 7 **Paint Waste Satellite Accumulation Area**

Unit Description: The Paint Waste Satellite Accumulation Area is located in a room on the second floor of Plant No. 2 (See Figure 2). The room is approximately 20 square feet, with concrete walls on all four sides. Three of the walls have doorways, each of which have a rolled berm to contain any spilled material. During the early 1980s, this area was designated as the facility's Interim Status hazardous waste storage unit. According to Mr. Rumbaugh, the facility never actually stored hazardous waste at the facility.

Date of Startup: The date of startup for this SWMU is unknown. However, it has been used for storage or accumulation of hazardous waste since at least the early 1980s.

Date of Closure: This SWMU was RCRA-closed in the early 1980s. This SWMU is currently active for satellite accumulation of hazardous waste generated during cleaning of painting equipment.

Wastes Managed: This SWMU manages hazardous paint-related waste generated during cleaning of facility painting equipment. The waste is generated from a cleaning solvent that contains acetone (D001/F003).

Release Controls: The floor of this SWMU is concrete and there are six-inch rolled berms at every opening to the room.

History of Releases: No releases have been documented.

Observations: The Paint Waste Satellite Accumulation Area was not well vented. The area was generally well organized and free of debris. A parts washer used for cleaning paint tools was located in the room. The 55-gallon drum in which waste was being accumulated at the time of the VSI had an open bung with an open funnel attached to it (See Photo No. 16). The drum was labelled "hazardous waste."

SWMU No. 8	**Four 500-Gallon Waste Oil ASTs**
Unit Description:	The four 500-Gallon Waste Oil ASTs are portable ASTs that are used to store waste oil generated during facility maintenance. At the time of the VSI three of the four ASTs were located outside near SWMU Nos. 3 and 10.
Date of Startup:	These ASTs were purchased in 1973.
Date of Closure:	This SWMU is currently active.
Wastes Managed:	This SWMU manages nonhazardous waste oil generated during facility maintenance.
Release Controls:	The area where this SWMU was located during the VSI has steel plates on the ground to somewhat limit the amount of spilled oil that could reach the soil.
History of Releases:	No releases have been previously documented (See Observations).
Observations:	The ASTs were in good condition and were clearly labeled "waste oil." Most of the ground in this area is covered with steel plates that are stained with oil and contain puddles with oily sheens. The soil between the plates in this area is stained black from oil as well (See Photo No. 12).

SWMU No. 9	**Oily Material Hopper**
Unit Description:	Checker uses a one cubic-yard open metal hopper to collect oily solid waste generated at the pressing/stamping lines.
Date of Startup:	The date of startup for this SWMU is unknown.
Date of Closure:	This SWMU is still active.
Wastes Managed:	This SWMU manages solid waste, such as rags and absorbent, which has become covered with oil used in association with the pressing/stamping operations.
Release Controls:	The hopper is made of steel and is in good condition. The SWMU is situated inside on a concrete floor.
History of Releases:	No releases have been documented.
Observations:	The SWMU was in good condition; the hopper was intact with no apparent cracks or leaks, and the area around it was free of debris. The SWMU was not labeled and it appeared that other general rubbish was also disposed of in this SWMU (See Photo No. 15).

SWMU No. 10 **1,100-Gallon Waste Oil UST**

Unit Description: The 1,100-Gallon Waste Oil UST is located between SWMU Nos. 3 and 8, just east of Plant No. 1 (See Figure 2). This SWMU is only partially underground; however it is regulated as an UST (See Photo No. 12). This SWMU is used to store waste oil accumulated in association with the oily wastewater sludge pit (SWMU No. 3).

Date of Startup: This SWMU was installed around 1972.

Date of Closure: This SWMU is still active, but is scheduled to be removed in 1991.

Wastes Managed: This SWMU manages nonhazardous waste oil accumulated in association with SWMU No. 3.

Release Controls: The area where this SWMU is located has steel plates covering the ground to help contain spills associated with the above ground piping. These plates are not completely connected.

History of Releases: No releases have been previously documented (See Observations).

Observations: SWMU Nos. 3 and 8 are in the immediate area of this SWMU. The skimmer used in association with SWMU No. 3 is attached to this SWMU. Chains are used to keep the arm of the skimming mechanism from swinging. The UST appears to be in good condition; there are no visible cracks or leaks in the tank or above ground piping. Most of the ground in this area is covered with steel plates that are stained with oil and contain puddles with oily sheens. The soil between the plates in this area is stained black from oil.

4.0 AREAS OF CONCERN

Dynamac identified six areas of concern during the VSI on October 7, 1991. These are discussed below. See Figure 2 for the location of all AOCs.

AOC No. 1 Diesel Fuel Oil Spill Area

The Diesel Fuel Oil Spill Area is located along the rail spurs that enter the Checker property from northeast corner (See Figure 2; Photo not available). In March 1986, a Grand Trunk and Western train derailed at the facility, rupturing a diesel fuel oil tank and spilling approximately 300 gallons of diesel fuel oil onto the ground. Clean-up crews excavated and removed soil contaminated by the spill. As an effort to prevent reoccurrence of such an event, Checker proposed to improve the condition of the tracks leading into their plant. Checker notified MDNR of the spill (Checker, 1986).

Because a release to on-site soils occurred and because file information does not indicate whether MDNR observed and/or approved of the clean-up activities, Dynamac considers this area to be an AOC.

AOC No. 2 PCB-Containing Transformer Area

The PCB-Containing Transformer Area is located immediately north of Plant No. 3 (See Figure 2 and Photo No. 17). On December 4, 1986, Checker notified MDNR that a PCB-containing transformer in this area had leaked, releasing an undetermined volume of oil to the surrounding area. Soil samples from the area of the leaky transformer indicated the presence of PCBs (Arochlor 1260) in the soils at levels up to 13 milligrams/kilogram. The MDNR Complaint/Response Form indicated that Checker proposed to remove all contaminated soils, dispose of them properly, and come into compliance with PCB regulations (MDNR, 1986c).

Because a release to on-site soils occurred and because file information does not indicate whether MDNR observed and/or approved of the clean-up activities, Dynamac considers this area to be an AOC.

AOC No. 3 UST Area No. 1

UST Area No. 1 is located south of Plant No. 2. In 1982, Checker removed three gasoline and two lacquer-based thinner USTs from this area (Tank Nos. 1, 2, 3, 4, and 5) (See Figure 2 and Photo No. 1). EPA and MDNR files provided no documentation of these removals. Mr. Rumbaugh stated during the VSI that he did not recall any excavation of contaminated soils during this UST removal. Because MDNR approval of this UST removal is pending additional investigation of a local TPH groundwater problem, Dynamac considers this area to be an AOC.

AOC No. 4 UST Area No. 2

UST Area No. 2 is located immediately east of the south end of Plant No. 1 (See Figure 2 and Photo No. 2). In 1990, two steel USTs (Tank Nos. 7 and 8) formerly containing wax (5,000-gallon capacity) and mineral spirits (1,000-gallon capacity) were removed from this area under MDNR observation.

According to a January 10, 1991, report by a consultant to Checker documenting the removal, five soil samples collected from the area beneath the two tanks and from the wall of the excavation contained significant quantities of total petroleum hydrocarbons (TPH) (up to 4,300 ppm) (BEI, 1991a). Other contaminants detected in soil samples included benzene, toluene, ethyl benzene, and/or xylene (BTEX) compounds and polynuclear aromatic hydrocarbons. A groundwater sample from the area contained 94 ppm TPH, but was non-detect for the other parameters mentioned. The report speculated that there may be two sources for the TPH contamination, the mineral spirits in Tank No. 8 and from a regional problem with TPH in the groundwater (BEI, 1991a). According to Mr. Rumbaugh, Checker's contractor removed approximately 300 cubic yards of soil in the area of the UST excavation; no information describing how the contractor determined the extent of contamination is available. Subsequent to the soil removal, the contractor backfilled the excavation with sand and gravel (See Photo No. 2).

Because a release to on-site soils has occurred and because MDNR has not approved the remediation associated with this UST pending additional studies related to the local TPH groundwater problem, Dynamac considers this location to be an AOC.

AOC No. 5 UST Area No. 3

UST Area No. 3 is located immediately northeast of Plant No. 1 (See Figure No. 2 and Photo No. 3). In December 1990, Checker removed one 6,000-gallon leaded fuel UST (Tank No. 9) under MDNR observation. This UST may have been installed as early as 1928 (Checker, 1991b).

A January 31, 1991, report generated for Checker documenting this removal states that at least twelve perforations were found along the bottom of the UST. Soil samples collected in the area of the UST indicated the presence of BTEX compounds as well as up to 11 ppm total lead. Groundwater samples from the area indicate the presence of both BTEX compounds and lead (BEI, 1991b). No other information regarding remediation activities at this UST was available in the report. According to Mr. Rumbaugh, MDNR observed the excavation of approximately 100 cubic yards of soil in the area of the UST.

Because a release to on-site soils has occurred and because MDNR has not approved the remediation associated with this UST pending additional studies related to the local TPH groundwater problem, Dynamac considers this location to be an AOC.

AOC No. 6 Taxi Storage Yard

The north end of the facility is an open, unimproved grassy lot. The part of this lot closest to the Service Garage is used for yard storage of old Checker taxicabs and miscellaneous decommissioned equipment (See Figure 2 and Photo No. 14).

Dynamac considers this area to be an AOC because no precautionary or containment measures are taken to guard against leaking or spilling of fuel, oil, or other liquids associated with the vehicles which may contain hazardous constituents. No documented or observed releases were noted in this area at the time of the VSI.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified 10 SWMUs and 6 Areas of Concern at the Checker facility. Background on the facility's location, operations, waste generating processes, release history, regulatory history, and environmental setting is presented in Section 2.0 SWMU-specific information, such as the unit's description, types of waste managed, release controls, release history, and visual observations, is discussed in Section 3.0. AOCs are discussed in Section 4.0. Following are Dynamac's conclusions and recommendations for each SWMU and AOC. Table 3 identifies the SWMUs and AOCs at the Checker facility and suggested further actions.

SWMU No. 1 **Hazardous Waste Drum Storage Area**

Conclusions: The Hazardous Waste Drum Storage Area is used to accumulate sound deadener and adhesive liners, drum bottoms (D001), and nonhazardous waste oil.

The potential for release to the soil, groundwater, and surface water is low. Dirty drum liners are accumulated in an open 55-gallon drum. The liners are solids and not prone to dispersion if spilled. Drum bottoms, manually cleaned from the dirty drum liners approximately once per week, are accumulated in a closed 55-gallon drum located on top of an absorbent pad which is disposed of as a hazardous waste when dirty. The drum bottoms are a very thick sludge-like substance.

Waste oil is stored in closed 55-gallon drums. The drums containing hazardous waste appeared to be in good condition. The SWMU is located inside Plant No. 2 on a concrete floor. No releases have been documented.

The potential for release to the air is high. Dirty drum liners containing sound deadener and adhesive drum bottoms are accumulated in an open 55-gallon drum, thus increasing volatilization of hazardous substances. The floor in this area was heavily stained with a black, grease-like substance (See Photo Nos. 5 and 7) and there was a noticeable odor. Without sampling the substance, Dynamac could not determine if the substance was nonhazardous waste oil or if it was residual sound deadener from the weekly cleaning of dirty plastic liners.

Recommendations: Dynamac recommends that Checker keep the 55-gallon drum used to collect waste drum liners closed except when being filled and that the facility clean up and properly dispose of the grease-like residue on the floor of this SWMU.

TABLE 3
SWMU AND AOC SUMMARY

	SWMU	Operational Dates	Evidence of Releases	Suggested Further Action
1.	Hazardous Waste Drum Storage Area	Mid-1980s to Present	None Documented	Keep 55-gallon drum for dirty plastic liners closed; clean up floor
2.	Oily Wastewater Collection Pits	Unknown to present	None Documented	None
3.	Oily Wastewater Sludge Pit	1972 to present	Stained soil; Standing water with oily sheen	*
4.	Scrap Metal Accumulation Pit	1920s to present	None Documented	None
5.	250-Gallon Waste Oil UST	Late 1920s to 1989	Documented soil contamination	Continue to pursue MDNR approval of remediation
6.	Waste Oil Drum Collection Areas	Unknown to Present	None Documented	Clean up floor
7.	Paint Waste Satellite Accumulation Area	Prior to 1980 to present	None Documented	Keep satellite accumulation drum closed unless adding waste
8.	Four 550-Gallon Waste Oil ASTs	1973 to Present	Stained soil; Standing water with oily sheen	*
9.	Oily Material Hopper	Unknown to Present	None Documented	None
10.	1,100-Gallon Waste Oil UST	1972 to present	Stained soil; Standing water with oily sheen	*

* SWMU Nos. 3, 8, and 10 are located in the same area, just west of the southwest corner of Plant No. 2. Dynamac suggests that Checker remove all visibly stained soil in the area and that Checker keep this area free of standing oily water.

TABLE 3 (continued)
SWMU AND AOC SUMMARY

	AOC	Operational Dates	Evidence of Releases	Suggested Further Action
1.	Diesel Fuel Oil Spill Area	March 1986	Facility notification to MDNR	MDNR review documentation of clean-up activities
2.	PCB-Containing Transformer Area	Unknown to 1986	Documented soil contamination	MDNR review documentation of clean-up activities
3.	UST Area No. 1	Unknown to 1982	None Documented	**
4.	UST Area No. 2	Mid-1970s to 1990	Documented soil and groundwater contamination	**
5.	UST Area No. 3	As early as 1928 to present	Documented soil and groundwater contamination	**
6.	Taxi Storage Yard	Unknown to present	None Documented	Drain fluids from taxis

** There has been documented soil and groundwater contamination in the areas of AOC Nos. 4 and 5. Some contaminated soil has been removed from these areas. MDNR approval of the remediation activities in the area of AOC Nos. 4 and 5, as well as in the area of AOC No. 3, is pending further investigation of a local groundwater contamination problem. Dynamac notes that there is no documentation of soil or groundwater contamination at AOC No. 3. However, in light of the area groundwater problem, none of the UST removals at the facility has been MDNR-approved. Dynamac recommends that Checker continue to pursue MDNR approval of remediation of these AOCs.

SWMU No. 2 **Oily Wastewater Collection Pits**

Conclusions: The Oily Wastewater Collection Pits, located under the pressing/stamping lines, are used to collect oily wastewater generated during process.

The potential for release to the air or surface water from this SWMU is low. The pits are concrete-walled and floored, covered by steel sheets and located indoors underneath the process lines. Discharge from this SWMU is directed to the Oily Wastewater Sludge Pit (SWMU No. 3).

An historical release from this SWMU occurred in 1986, when facility personnel intentionally diverted discharge from the SWMU No. 3 to the Kalamazoo River. Since being issued a Notice of Noncompliance by the MDNR, the facility has not repeated this release.

The potential for release to the soil or groundwater from routine operation of this SWMU is moderate. The pits have been in operation for a long time, thereby presenting the potential that the concrete lining may no longer be intact. This SWMU was inaccessible for inspection during the VSI.

Recommendations: No further actions are recommended at this time.

SWMU No. 3 **Oily Wastewater Sludge Pit**

Conclusions: The Oily Wastewater Sludge Pit is used to separate oil and wastewater generated at the pressing/stamping lines. Oily wastewater originally collected at SWMU No. 2 is discharged to this SWMU. An oil skimmer removes floating oil, which is subsequently transferred to a waste oil UST (SWMU No. 10). Separated wastewater is discharged to the KWRP. Sludges accumulating at the bottom of this pit have not been removed since its installation in 1972.

The potential for release to the air and surface water is low. The waste managed is primarily water. Wastewaters are discharged to the KWRP.

The potential for release to the soil and groundwater is high. This SWMU has 12-inch concrete walls and floor, with approximately three feet of freeboard. The ground surrounding the SWMU has steel plates providing some protection against spills. However, these plates are not completely connected and show significant signs of staining and

standing puddles with an oil sheen. The visible walls of the sludge pit are heavily stained as well.

No acute spills or releases have been documented.

Recommendations: Dynamac recommends that Checker clean up the area around this SWMU, remove visibly stained soil, and keep this area free of oil.

SWMU No. 4 **Scrap Metal Accumulation Pit**

Conclusions: The Scrap Metal Accumulation Pit is used to collect scrap metal generated from the pressing/stamping process. This SWMU is concrete-lined and has a gravel floor.

The potential for release to the air, soil, groundwater, and surface water is low. This SWMU is concrete-walled and manages only clean solid scrap metal. Although the floor of this SWMU is lined with gravel only and has no roof, the steel is in large pieces and is oil-free.

Recommendations: No further actions are recommended at this time.

SWMU No. 5 **250-Gallon Waste Oil UST**

Conclusions: The 250-Gallon Waste Oil UST was used to store nonhazardous waste oil generated during facility maintenance. This SWMU was removed in 1989 under MDNR oversight.

The potential for release to air and surface water is low. The UST has been removed and any contamination that remains in the area is below ground.

The potential for a release to groundwater is moderate. According to Mr. Rumbaugh, Checker excavated and removed soil to the ground water (approximately 10 feet below ground surface) under the direction of the MDNR. MDNR approval of this UST removal is pending additional investigation of a local groundwater contamination problem.

Recommendations: Dynamac recommends that Checker continue to pursue MDNR approval of remediation at this SWMU.

SWMU No. 6 **Waste Oil Drum Collection Areas**

Conclusions: The three Waste Oil Drum Collection Areas are used to collect nonhazardous waste oil generated during facility maintenance.

The potential for release to the air, soil, groundwater, and surface water is low. The waste oil is stored in closed 55-gallon drums that are in good condition. All three Waste Oil Drum Collection Areas are located indoors and on concrete floors. The waste oil collection drum located inside Plant No. 1 is set upon absorbent material to further contain any spilled oil. Likewise, the waste oil collection drums located inside the Service Garage are set inside fiberglass tubs to contain any spill.

Dynamac notes that the floor of the Waste Oil Drum Collection Area associated with SWMU No. 1 (inside Plant No. 2) was stained with a black, grease-like substance. Dynamac was unable to determine if the substance was nonhazardous waste oil or if it was sound deadener residue from weekly cleaning of dirty plastic drum liners collected in SWMU No. 1.

Recommendations: Dynamac recommends that Checker clean up and properly dispose of the grease-like residue on the floor in the Waste Oil Drum Collection Area in Plant No. 2. No further actions for the other two Waste Oil Drum Collection Areas are recommended at this time.

SWMU No. 7 **Paint Waste Satellite Accumulation Area**

Conclusions: The Paint Waste Satellite Accumulation Area is used to accumulate hazardous solvent-based paint wastes containing acetone (D001/F003) generated during cleaning of facility painting equipment.

The potential for release to air is high. The 55-gallon drum used to accumulate the paint waste was open at the time of the VSI and there was a notable odor in the room.

The potential for release to the soil, groundwater and surface water is low. This SWMU is located on a concrete floor on the second floor of Plant No. 2. Any material spilled in this SWMU would be contained within the area by eight-inch rolled berms at each opening.

Recommendations: Dynamac recommends that Checker keep the 55-gallon satellite accumulation drum closed to prevent the continuous release of hazardous vapors to the surrounding area.

SWMU No. 8 **Four 500-Gallon Waste Oil ASTs**

Conclusions: The four 500-Gallon Waste Oil ASTs are used to store nonhazardous waste oil generated during facility maintenance.

The potential for release to air and surface water is low. The tanks are in good condition and there is no pathway for run-off from this area to reach any surface water body.

Dynamac observed a release to on-site soils during the VSI. The ground surrounding this SWMU has steel plates providing some protection against spills. However, these plates are not completely connected and show significant signs of standing puddles, as well as staining of the steel plates and the ground between the plates. This situation presents a moderate to high potential for migration to groundwater, which is encountered as shallow as 5.5 feet below ground surface (BGS) at the facility.

Recommendations: Dynamac recommends that Checker clean up the area around this SWMU, remove visibly stained soil, and keep the area free of oil.

SWMU No. 9 **Oily Material Hopper**

Conclusions: The Oily Material Hopper is used to collect solid waste covered with oil generated during the pressing/stamping process.

The potential for release to the air, soil, groundwater, and surface water is low. This SWMU is in good condition and is located indoors on a concrete floor.

Recommendations: No further actions are recommended at this time.

SWMU No. 10 **1,100-Gallon Waste Oil UST**

Conclusions: The 1,100-Gallon Waste Oil UST is used to store nonhazardous waste oil generated in association with the Oily Wastewater Sludge Pit (SWMU No. 3).

The potential for release to air and surface water is low. The tank is in good condition and there is no pathway for run-off from this area to reach any surface water body.

Dynamac observed a release to the soil. The potential for release to groundwater is high. The ground surrounding the SWMU has steel

plates providing some protection against spills. However, these plates have openings between each other and show significant signs of staining and standing puddles with an oil sheen. There is no information available that suggests that there were any release controls installed in association with this UST.

Recommendations: Dynamac recommends that Checker clean up the area around this SWMU, remove contaminated soil under MDNR guidelines to meet MDNR cleanup levels, and take the necessary actions to prevent future releases from this SWMU.

AOC No. 1 **Diesel Fuel Oil Spill Area**

The Diesel Fuel Oil Spill Area is located along the rail spurs that enter the Checker property from northeast corner (See Figure 2; Photo not available). In March 1986, a Grand Trunk and Western Train derailed at the facility, rupturing a diesel fuel oil tank and spilling approximately 300 gallons of diesel fuel oil onto the ground. Therefore, there has been a documented release to the soil at this SWMU. Because clean-up crews excavated and removed soil contaminated by the spill, the potential for release to the groundwater or surface water from this incident is low. During the spill, the fuel spilled on the ground probably volatilized to the air. However, this was a one-time release with a low probability of reoccurrence.

Dynamac has identified this location as an AOC because it has experienced a documented release to the soil. Because Dynamac could not find any documentation of clean-up activities related to this AOC in MDNR files, Dynamac recommends that MDNR review such documentation to ensure that clean-up activities were sufficient and that all contaminated material was disposed of properly.

AOC No. 2 **PCB-Containing Transformer Area**

The PCB-Containing Transformer Area is located immediately north of Plant No. 3 (See Figure 2 and Photo No. 17). This AOC had a documented release to on-site soils. On December 4, 1986, Checker notified the MDNR that a PCB-containing transformer in this area had leaked, releasing an undetermined volume of oil to the surrounding area. Soil samples from the area of the leaky transformer indicated the presence of PCBs (Arochlor 1260) in the soils at levels up to 13 milligrams/kilogram. An MDNR Complaint/Response Form states that Checker proposed to remove all contaminated soils, dispose of them properly, and come into compliance with PCB regulations (MDNR, 1986c).

The potential for release to the groundwater, surface water, and air from this location is low. PCBs are not highly volatile. According to Checker representatives, the facility immediately responded to the spill and removed contaminated soil, thereby limiting the potential for migration to groundwater or surface water.

Because there has been a documented release to the soil at this location, Dynamac considers this area to be an AOC. Because documentation of the soil cleanup was not available at the time of the PA/VSI, Dynamac recommends that MDNR review the remedial actions taken at this AOC to ensure that cleanup was completed properly.

AOC No. 3 **UST Area No. 1**

UST Area No. 1 is located south of Plant No. 2. In 1982, Checker removed three gasoline and two lacquer-based thinner USTs from this area (Tank Nos. 1, 2, 3, 4, and 5) (See Figure 2 and Photo No. 1). EPA and MDNR files provided no documentation of these removals. Mr. Rumbaugh stated during the VSI that he did not recall any excavation of contaminated soils during this UST removal.

The potential for a release to the air or surface water from this location is low. The source of concern are five USTs. The likely route of any spill or release would have been underground to the soil. The potential for future releases to the soil or groundwater is also low, because the USTs were removed in 1982. The potential for a historical release to the soil or groundwater is unknown, because documentation of the UST removals was not available from MDNR or Checker during the PA/VSI.

There is no documentation of soil or groundwater contamination at AOC No. 3. Dynamac notes that, according to Checker, MDNR-approval of all of Checker's UST removal actions is being withheld pending additional investigation of a local TPH groundwater contamination problem. Because of this outstanding issue, Dynamac considers this location to be an AOC. Dynamac recommends that Checker continue to pursue MDNR approval of remediation of this AOC.

AOC No. 4 **UST Area No. 2**

UST Area No. 2 is located immediately east of the south end of Plant No. 1 (See Figure 2 and Photo No. 2). In 1990, two steel USTs (Tank Nos. 7 and 8) formerly containing wax (5,000-gallon capacity) and mineral spirits (1,000-gallon capacity) were removed from this area under MDNR oversight.

The potential for a release to the air or surface water from this location is low. The sources of concern are two USTs. There has been a documented release to the soil and groundwater from this AOC.

According to a January 1991 report documenting the removal, five soil samples collected from the area beneath the two tanks and from the wall of the excavation contained significant quantities of total petroleum hydrocarbons (TPH) (up to 4,300 ppm). Other contaminants detected in soil samples included benzene, toluene, ethyl benzene, and/or xylene (BTEX) compounds and polynuclear aromatic hydrocarbons. A groundwater sample from the area contained 94 ppm TPH, but was non-detect for the other parameters mentioned. The report, prepared by a consultant to Checker, speculated that there may be two sources for the TPH contamination, the mineral spirits in Tank No. 8 and from a regional problem with TPH in the groundwater (BEI, 1991a). According to Mr. Rumbaugh, Checker's contractor removed approximately 300 cubic yards of soil in the area of the UST excavation; no information describing how the contractor determined the extent of contamination is available. Subsequent to the soil removal, the contractor backfilled the excavation area with sand and gravel (See Photo No. 2).

Mr. Rumbaugh added that the MDNR has not approved the remediation associated with this UST pending additional studies related to the local TPH groundwater problem (Checker, 1991b). Dynamac recommends that Checker continue to pursue MDNR approval of remediation of this AOC.

AOC No. 5 **UST Area No. 3**

UST Area No. 3 is located immediately northeast of Plant No. 1 (See Figure No. 2 and Photo No. 3). In December 1990, Checker removed one 6,000-gallon leaded fuel UST (Tank No. 9) under MDNR observation. This UST may have been installed as early as 1928 (Checker, 1991b).

The potential for a release to the air or surface water from this location is low. The source of concern is an UST. There has been a documented release to the soil and groundwater from this AOC.

A January 1991 report generated for Checker documenting the removal of this UST states that at least twelve perforations were found along the bottom of the UST. Soil samples collected in the area of the UST indicated the presence of BTEX compounds as well as up to 11 ppm total lead. Groundwater samples from the area indicate the presence of both BTEX compounds and lead (BEI, 1991b). No other information regarding remediation activities at this UST was available in the report. According to Mr. Rumbaugh, MDNR observed the excavation of approximately 100 cubic yards of soil in the area of the UST.

Mr. Rumbaugh added that the MDNR has not approved the remediation associated with this UST pending additional studies related to the local TPH groundwater problem (Checker, 1991b). Dynamac recommends that Checker continue to pursue MDNR approval of remediation of this AOC.

AOC No. 6 **Taxi Storage Yard**

The north end of the facility is an open, unimproved grassy lot. The part of this lot closest to the Service Garage is used for yard storage of old Checker taxicabs and miscellaneous decommissioned equipment (See Figure 2 and Photo No. 14).

Dynamac considers this area to be an AOC because no precautionary or containment measures are taken to guard against leaking or spilling of fuel, oil, or other liquids associated with the vehicles which may contain hazardous constituents. No documented or observed releases were noted in this area at the time of the VSI.

Because no precautionary measures are taken to drain vehicles of fluids and because no routine inspections are conducted to check for leaks, the potential for release to the air, soil, or groundwater is moderate. Because there is not a large amount of free liquids present, the potential for release to surface water is low. Dynamac notes that the volume associated with any potential release is likely to be moderate. However, continued use of this area for storage has the potential for a cumulative impact from releases over time.

Dynamac recommends that the taxis be drained of all fluids prior to their storage at AOC No. 6.

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ATTACHMENT A

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION (VSI) SUMMARY

CHECKER MOTORS CORPORATION
2016 N. PITCHER STREET
KALAMAZOO, MICHIGAN 49007
MID 005 319 009

Date:	October 7, 1991
Facility Representative:	Dick Rumbaugh, Environmental Co-Ordinator and Plant Engineer
Inspection Team:	Joseph Weslock, Dynamac Corporation Deborah Hall, Dynamac Corporation Valerie Farrell, Dynamac Corporation
Photo Documentation:	Deborah Hall
Weather Conditions:	Sunny, 50 degrees Fahrenheit
Summary of Activities:	The VSI began at 8:30 a.m. at the Checker Motors Corporation facility at 2016 Pitcher Street. Mr. Weslock reviewed the purpose of the facility visit with Mr. Rumbaugh. Mr. Rumbaugh gave a brief overview of the historical production activities at the facility, leading up to the current activities. Mr. Rumbaugh described the facility as a 65-acre property, with buildings occupying approximately nine of those acres. He continued to summarize the neighborhood as follows. The Kalamazoo Water Reclamation Plant lies just east of the facility, across from a Conrail railway line. Immediately adjacent to the facility along the south border is a James River Paper facility. To the west, across Pitcher Street, is Alan Electric and Clausing Machinery. The City of Kalamazoo owns a nursery (greenhouse) located north of the facility across from Mosel Road. Downtown Kalamazoo is one mile north-northeast of the Checker facility. The metropolitan population of Kalamazoo is 90,000 to 100,000 persons.

Mr. Rumbaugh summarized the waste generating processes that are no longer in operation at the facility and then continued to describe those waste generating processes that are currently in operation at the facility. In addition, he also described the solid waste management units used to manage the wastes generated. This included several underground storage tank removals.

Discussion continued concerning the facility's regulatory history and status, including air and NPDES permits, and their status as a generator of RCRA wastes.

At approximately 10:45 a.m., the inspection participants began the tour of the facility. The tour included all process areas and solid waste management units at the facility.

During the tour, Dynamac observed 10 solid waste management units, two of which are currently used to store hazardous wastes. One of these areas is currently used as a hazardous waste drum storage area, for storing drums containing D001 waste for less than 90 days. The other area is a paint waste satellite accumulation area for solvent-based paint wastes generated from cleaning painting equipment used during facility maintenance. During the early 1980s, this area was designated as the facility's Interim Status hazardous waste storage unit. According to Mr. Rumbaugh, the facility never actually stored hazardous waste at the site.

Dynamac photographed solid waste management units and areas of concern that were observed during the tour. Dynamac conducted a brief exit interview with Mr. Rumbaugh before leaving the facility at 2:15 p.m.

PHOTOGRAPHIC LOG
CHECKER MOTORS CORPORATION
KALAMAZOO, MICHIGAN

Photo No.: 1 Location: AOC No. 3
Orientation: South Date: October 7, 1991
Description: UST Area No. 1. Three gasoline USTs and two lacquer thinner USTs were removed from this location in 1982.

Photo No.: 2 Location: AOC No. 4
Orientation: North Date: October 7, 1991
Description: UST Area No. 2. One 1,000-gallon wax UST and one 5,000-gallon mineral spirits UST were removed from this area in 1990.

Photo No.: 3 Location: AOC No. 5
Orientation: Southwest Date: October 7, 1991
Description: UST Area No. 3. One 6,000-gallon leaded gasoline UST was removed from this location in December 1990.

Photo No.: 4 Location: SWMU No. 5
Orientation: West Date: October 7, 1991
Description: One 250-gallon waste oil UST was removed from this area in 1989. The excavation area has been backfilled with sand and gravel.

Photo No.: 5 Location: SWMU No. 1
Orientation: East Date: October 7, 1991
Description: Drum containing dirty liner is open and on the left of the photo. A satellite accumulation drum filled with drum bottoms cleaned from dirty liners is on the right.

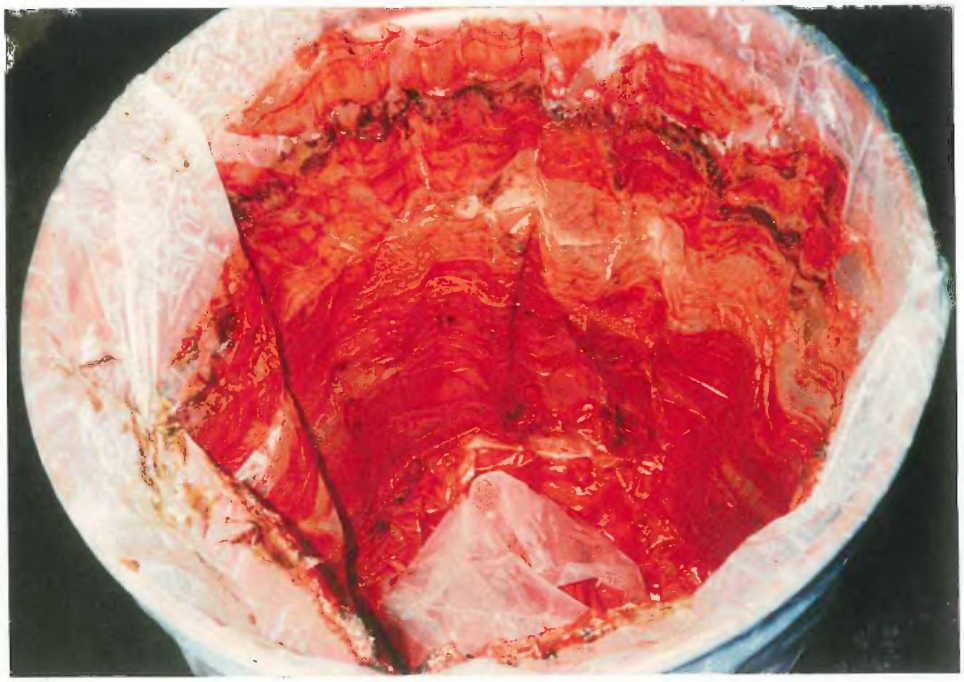

Photo No.: 6 Location: SWMU No. 1
Orientation: East Date: October 7, 1991
Description: Close-up photo of drum containing dirty liner prior to being cleaned. The drum bottoms remaining in the liner will be scraped out and placed in the satellite accumulation drum shown in Photo No. 5.

Photo No.: 7 Location: SWMU Nos. 1 and 6
Orientation: North Date: October 7, 1991
Description: Hazardous waste drum storage area (SWMU No. 1); also used as one of three waste oil drum collection areas (SWMU No. 6). Blue drum in foreground is used to collect dirty drum liners (See Photo No. 6). Approximately once per week, dirty liners collected here are manually cleaned. Drum bottoms (D001) are placed in satellite accumulation drum (See Photo No. 5). Cleaned plastic liners, no longer ignitable, are disposed of with municipal trash.

Photo No.: 8 Location: SWMU No. 6
Orientation: North Date: October 7, 1991
Description: One of three waste oil drum collection areas. This one is located inside Plant No. 1. Drum in center of photo contains waste oil.

Photo: 9
Location: SWMU No. 6
Orientation: South
Date: October 7, 1991
Description: One of three waste oil drum collection areas. This one is located in the Service Garage. Waste oil drums are staged inside fiberglass tubs.

Photo No.: 10
Location: SWMU No. 2
Orientation: East
Date: October 7, 1991
Description: One of approximately 40 pressing/stamping lines. The oily wastewater collection pits are located under each pressing/ stamping line.

Photo No.: 11 Location: SWMU No. 3
Orientation: West Date: October 7, 1991
Description: Sludge pit containing oily wastewater from SWMU No. 2. Concrete walls of pit are stained from oil. The 14-foot wall in the center of the pit gives the appearance of two pits.

Photo No.: 12 Location: SWMU Nos. 8 and 10
Orientation: West Date: October 7, 1991
Description: 1,000-gallon waste oil UST (SWMU No. 10) used to store oil skimmed from sludge pit (SWMU No. 3) is in foreground. In the rear of the photo are three of four 500-gallon portable waste oil ASTs (SWMU No. 8). Steel plates covering the ground in this area contain puddles of water with oily sheens and are stained in areas.

Photo No.: 13 Location: SWMU No. 4
Orientation: West Date: October 7, 1991
Description: Scrap metal accumulation pit located outside Plant No. 2.

Photo No.: 14 Location: AOC No. 6
Orientation: West Date: October 7, 1991
Description: Old taxis in taxi storage yard at north end of the facility property. Area underneath and behind the taxis is unimproved and not paved.

Photo No.: 15 Location: SWMU No. 9
Orientation: South Date: October 7, 1991
Description: Oily solid material in one cubic-yard hopper located in Plant No. 2, near the metal stamping/pressing lines.

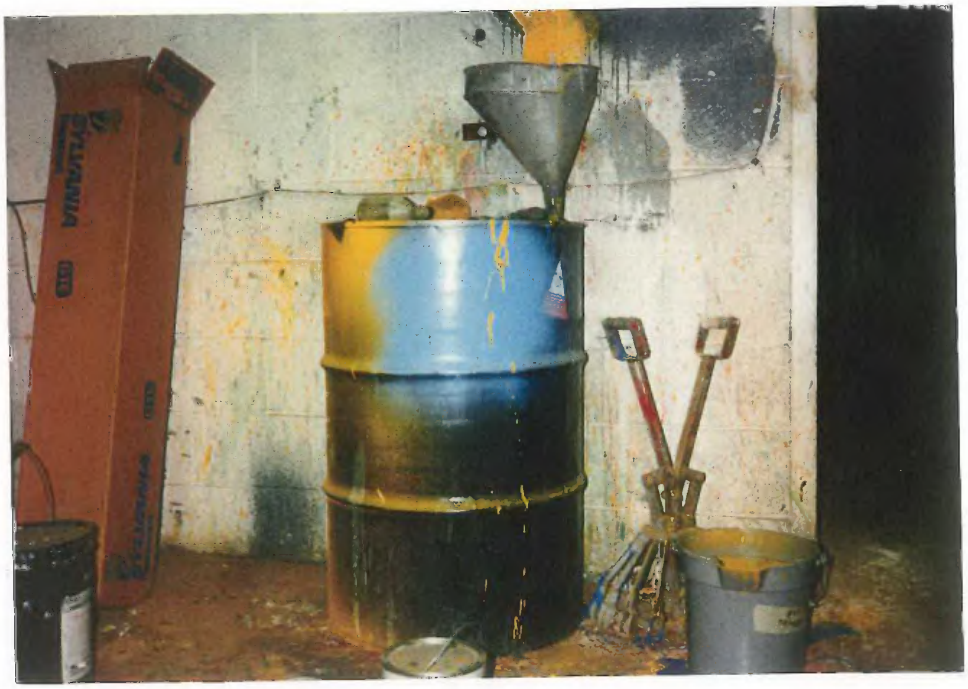

Photo No.: 16 Location: SWMU No. 7
Orientation: South Date: October 7, 1991
Description: Waste paint satellite accumulation drums (D001) located on second floor of Plant No. 2. The drum has an open bung and the funnel does not have a cover.

Photo No.: 17 Location: AOC No. 2
Orientation: Southeast Date: October 7, 1991
Description: PCB-Containing Transformer Area. PCB-containing transformer that leaked in 1986 was removed from this location, along with contaminated soil.

END OF PHOTOGRAPHIC LOG

ATTACHMENT B

VISUAL SITE INSPECTION
FIELD NOTES

Checker Motors Co. 10/7/91

Arrival: 8:30 am

Weather: ~40°F, clear (pt. cloudy)

Dynamac Personnel: Joe Weslock, Valerie Farrell, Deborah Hall

Checker personnel: Dick Rumbaugh

The inspection began with an interview in Mr. Rumbaugh's office.

In 1928, Checker motors began building their own cabs.

1922-1982 cab production

Hadley Knight - Car Corp. from 1922-1928

One building was present @ that time & subsequent ones built throughout time

Mid 60's Contract work began - metal stapping

1982 - stopped production of cabs & went into contract part supply exclusively

Did have ~1200, but dropped to ~350 employees at present time.

Stamp, spot weld, adhesive (structural) work are present operations (no finishing) on exterior metal parts

In the past, prod. processes included everything related to car production
then, 1 shift = 5 days/wk
now, 3 shifts - 6 days/wk (stamping ops.)

Property is ~65 acres, w/ building occupying ~9 acres (v. little paved areas - only empl. parking lots) gravel covers 1/3 - 1/4

In past - did own plating & finishing - had ~~~~ NPDES permit for non-contact cooling & process/cooling water

The fac. is w/in 1/2 mi of Kalamazoo River (Kal Riv.) w/ city prop 1/2 (between) waste trmt center
2 outfalls - 1 permitted, & the other was aquired w/ purch. of neighboring building. They have a common discharge into Kal riv.

This purch. building was a foundry for Kal. Stove & then another Co. bought. Stoppect 1930's
Military Co during WWII
purch. in 1975
building equipt. - amphibian tank
Conrail has right to prop. to the east & to the west behind neighbor

Recieve & Ship via rail - no wastes through.

WWTP east, James River to South
Mosel St. to north & city of Kal.
nursery (trees, greenhouse, etc.),
no real machinery is there.
Alan (Electric) - test products
Clausing Machinery - makes forge

Heart of downtown is N-NE,
~ 1 mi away

Kal w/ subs. ~ 90,000-100,000

Plating ops. stopped in 82-83,
Presently ~1/4 of fa

Ni, Cr, Zn, Cd. plating
way back they also used Cu

The wastes were discharged to
City sewer, there were holding
tanks assoc. w/ process & retention
for pH control

↓ 5,000 units (cars)/yr.

Ni & tanks > was sold or recycled off-site Hirshaw (Chem?)
Cd - was waste-hauled off-site

Past - Used thinners 1 for paint mixing, 1 for wash solvent.
laquer thinners -

Wash solvents were contained in drums & taken off site where it was distilled & 'clean' solvent was returned to fac.

Processes - Painting & Plating

Now - sheet metal stamping, assembling (spot welding, adhesive)

Pit ~70 yrs since but system 1920s

Scrap metal is recycled off-site stored in a pit (trans. by underground conveyor) ↳ concrete lined ~30 ft² & 10 ft deep. / then crane loads ↳ 18" thick
into truck & hauls off . . .
metal offal

Property is fenced w/ 24 hr. security

→ steel, 3/4 galvanized coated w/ Zn

Drum bottoms from adhesives
Sound Deadener - asphaltic (almost tar) applied to door to give depth to sound

adhesive - pick up

Assembly line - type processes: metal is stamped, sound deadener is applied, adhesive is applied.

Waste gen (99%) by cleaning drums - they have removable liners which are accum. & then cleaned out ↳ in drum which is taken to where plating used to be. They are cleaned & taken to type II LF. The waste is accum. in other drums and is D001 (flashpoint.) This happens 1 x/wk.

Approx 500 drums dead./yr. & maybe 50 drums waste/yr. at best (D001) Adhesive approx. 80 drums/yr. ↳ better est. 20-25 drums. ↳ maybe for 6 drums/yr

The area has a 'catch' system that goes to retention tanks that eventually goes to city, the area is fairly well contained, thick concrete floor.

Use lubricating oils for machinery - presses use alot

Also stamping lubs (mineral & animal)

Waste hand oil & oil/water mixes →

~ 50,000 gal wastewater/oil mix/yr
~ 5,000 gal max of mach. oil/yr.

→ They stay on the part until assembly - the metal is sprayed & the excess drips off this mach. is washed w/ water & alkaline wash all of this is shipped as waste.
When the mach breaks down the oil 4in is changed. The oil here is vaccumed out & taken to one of 4 500 gal ASTs outside on concrete pad

11,000 UST is part of WWDS after 1972 skimmer the oil is collected here & then shipped off-site This tank is to be removed this yr.
inst. ~1970

Maintainence painting in fac.
~ 1 drum solvent/yr
Occasionally gen. 1 drum waste paint/yr

(Thinner for cleaning (Acetone, Methyl Isobutyl Ketone, Toluene etc.)

Other USTs,
2 assoc w/ coating sys. (wax coating) 5000 & 1000 gal removed 1990 (steel) MDNR supervised
installed mid 70s
6,000 gal gasoline
inst. unknown - maybe 1928

w/ 2 tanks some soil removed
GW sampling – presently discussing w/ DNR: contam. was not assoc. w/ contents of tanks.....
→ mineral spirits, total hydrocarb. max ~ 300 yd³ removed.

6,000 gal – removed ~ 1991 loaded gasoline

Service garage area in past
2500 Waste oil tank (just. underground no network)
exc. to water 1989

→ tank was leaking ~ 100 yd³ of soil removed.

(not product waste) 3 gas tanks, 2 thinner (lacquer) ? assoc w/ car prod.
removed in 1982

Lease History

transformer leak – 200 yds soil & concrete (PCB) to 'clean' dirt 1987 DNR supervised.
Disposed of 3 transformers removed at that time
(Declassified by 1988)

Oil spill to river ~1986 from an employee pumped oil from pit into sewer instead of into portable 500 gal tank (water/oil mix)

↓ 40-ton fac., no control - strt. vent to air - permitted.

Grand trunk RR - derailment ruptured fuel tank on train in 1986

Outfalls - permitted

began disch. 1920's

001 - plant 1 & 2 > non-contact storm runoff

002 - plant 3

2/10 1,000,000 gal/day

to Kal riv.

1940's - All contact water goes thru skimmer before WWTP Kal water Reclamation Plant.

Continuous - no prior monitoring however now must go into self-monitoring (not begun yet).

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500 gal portable tanks began around 1973 during oil crisis

Waste

Adhesive / Deadener began mid-80's

Scrap metal Offal - 1928

Reg. History

RCRA - Orig. Notif.

Closure

check file info. USGS will send in mail as well

Air Perm -

Calculated emissions not measured ... no control

GW

Public wells are scattered throughout

GW is used for drinking

→ most are out of river valley

On-site - there are inactive wells for process water used in the past

MW's are in place in approx. 4/1575

GW flow is E-NE (to river)

varies w/ rainfall

Parchment Public Wells are ~ 4-5 mi downstream

Ft Hosp. Boregass is south 1-2 mi

Winds from SW in winter from West

Fire assoc. w/ coating process area late 80's - FPD was called but it was handled internally - runoff water was operated.

Begin Tour @ 10:45

Photo 1: 2 USTs coating/wax S 1050 along bldg 1

Scrap metal is accum. in totes throughout fac

Photo 2: Waste oil collection Drum. N 11:05 6 only one

Photo 3: E 6,000 gal UST area 11:05

Photo 4: 250 gal oil UST 11:10 W Area.

Photo 5: Car junk yard W 11:15

Photo 6: N Parts washer 11:20

Photo 7: Waste oil S 11:20 Collection Drums

Photo 8: Pressing/Stamping area. - representative below is pit where fluid/oil mists accum 11:30 E

Oil Absorbing material is collected in hoppers & disposed of in type II LF

Photo 9: S 1135

Photo 10: Empty (Drum w/ liner) Sand Dead Drum in Staging area E 1040

Photo 11: N 11:40 Blue drum is liner collection Drum Others are full of Waste from liners

Photo 12: Drums being filled from liner cleaning – will be kept w/ Drums in #11 (labeled, dated when full) E 1145

Photo 13: W 1150
Sludge pits that receive waste from equip. washing + powerhouse boiler blowdown water discharge
15'x12 deep
disposal of oil
installed w/ tank

Photo 14: 500 gal Waste Oil tanks portable W 1155 & UST to be removed this year

Photo 15: Scrap metal offal pit gets filled 2x daily – turbine off-site for recycling W 1200

Break for lunch

1:15 Back from Lunch

(fac is ~ 200-300 yds from Kal R.V. 7/10 mi)

Photo 16: Former area where PCB - containing transformers were located S 1:20

Photo 17: Area were 2 lacquer thinner USTs were located S 1:25

Photo 18: E old paint booth 1:30

Photo 19: S 1:30 paint thinner accum. drum

The area
Paints, a t
all berm

→ RCRA

Industr
Railway
WWTP
Shop
Reside
Left fac.

. mech

0 - 300 yds (from 3/10 mi)

a area where
ing transformers
S 1:20

are 2 lacquer thinner
ocated S 1:25

paint booth 1:30

paint thinner accum.

The areas where D001 product, paints, & the paint cleaning areas are all bermed. (also oil)

→ RCRA generator

Industry N & West
Railway E & West
WWTP to the E, then Fall Riv.
& Shopping Center NE of River
Residential E of River
Left fac. ~ 2:15p.